EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

TALIA N. HARRISON,	*	
	*	
Plaintiff,	*	
	*	
vs.	*	No. 4:21-cv-00607-ALM
	*	
TYLER TECHNOLOGIES, INC.,	*	
	*	
Defendant.	*	

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ORAL AND VIDEOTAPED DEPOSITION OF

TALIA N. HARRISON

JANUARY 19, 2022

(Conducted Remotely)

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ORAL AND VIDEOTAPED DEPOSITION OF TALIA N. HARRISON, produced as a witness at the instance of the Defendant, and duly sworn, was taken in the above-styled and -numbered cause on the 19th day of January, 2022, from 9:32 a.m. to 5:20 p.m., before Leah K. Osteen Dow, CSR in and for the State of Texas, reported remotely by machine shorthand, with the witness being located in Little Rock, Arkansas, taken pursuant to the Federal Rules of Civil Procedure and the provisions stated on the record.

09:42 Q. Other than Ms. Greene, have you discussed your lawsuit with anyone else?

09:42 A. I have not.

09:42 Q. Does your sister work at Tyler?

09:42 A. She does.

09:42 Q. What's your sister's name?

09:42 A. Latisha Harrison.

09:42 Q. And have you discussed your lawsuit with her?

09:42 A. I do not discuss my lawsuit with her.

(Exhibit 1 marked.)

09:43 Q. Okay. Ms. Harrison, I've introduced what will be Exhibit 1. Do you see that document in front of you?

09:43 A. Yes, ma'am.

09:43 Q. Great. And it's a little funky with these remote depositions, with sharing exhibits through share screen. So if at any point you need me to make it bigger so you can read it better, or scroll up or down, just let me know.

09:43 A. Okay.

09:43 Q. So do you recognize this document that's Exhibit 1?

09:43 A. I do.

09:43 Q. Are you still reviewing it?

09:43 A. Oh, no, ma'am. I'm sorry. I said I do. I'm sorry, I didn't know you didn't hear me. I do recognize

09:43 it, yes.
Q. Okay. Okay. Great. And is this the offer letter you received for ExecuTime back in August of 2013?
09:44 A. Yes, that is correct.
09:44 Q. And ExecuTime was acquired by Tyler in June of 2016, correct?
09:44 A. That is correct.
09:44 Q. So in this offer letter, you were offered the position of project manager, slash, trainer; is that right?
09:44 A. Yes.
09:44 Q. And your annual salary was 48,000?
09:44 A. Yes.
09:44 Q. And the letter informed you that your position was exempt from overtime under the FLSA, or the Fair Labor Standards Act?
09:44 A. Yes.
09:44 Q. So when you received this offer letter, you understood that you would not be receiving any additional pay for hours worked over 40 hours per week?
09:45 A. Yes.
09:45 Q. So what is the ExecuTime software?
09:45 A. It's a timekeeping software used throughout different municipalities for tracking of, you know,

regular hours, overtime, shift differential pay, things of that nature. The time is calculated in ExecuTime, and then it's exported into various payroll vendors, whatever the client uses, to actually do the calculations and create the paychecks and direct deposits, things of that nature.

09:45 Q. And after the Tyler acquisition of ExecuTime in 2016, you remained involved with ExecuTime software?

09:45 A. Yes.

09:46 Q. You continued to serve in that project manager role?

09:46 A. Yes.

09:46 Q. And at some point did you become a senior project manager?

09:46 A. Yes.

09:46 Q. When did that happen?

09:46 A. I want to say that was around -- it was shortly after I started, I don't even think a year. I want to say November of -- oh, gosh. Give me one second. I'm sorry. No, the senior project manager title happened after the acquisition. That's what it was. So it would have been June, July of 2016. That is the title Tyler gave me.

09:46 Q. Did your compensation change?

09:46 A. Not with the title change, that I can recall.

09:47 Q. Did you receive annual salary increases?
09:47 A. I did.
09:47 Q. Were those for a fixed amount, or did it vary year by year?
09:47 A. It would vary year by year, but, you know, they were pretty consistent with giving me anywhere between 3 and 3.5 percent.
09:47 Q. When you worked as a senior project manager, did you work remotely, from home?
09:47 A. It -- I had the option to work from home some days, usually Fridays. But for the most part, I was -- during that specific time frame, I was going to the office Monday through Thursday, usually working from home on Fridays.
09:48 Q. When you say "that" time frame, what time frame are you referring to?
09:48 A. The time frame that we're asking, for wages.
09:48 Q. So at any point that you were in the senior project manager role, did you transition from working primarily in the office to working primarily from home?
09:48 A. Yes.
09:48 Q. When did that occur?
09:48 A. That would have been -- I want to say February of 2019 through the remainder of my tenure.
09:48 Q. And you were in that senior project manager

role until around November of 20 --
09:49 A. '19.
09:49 Q. '19?
09:49 A. Yes, ma'am.
09:49 Q. And what was your compensation at the time you left the senior project manager role in November of 2019?
09:49 A. Around sixty-four four. 64,400.
09:49 Q. And you said in February 2019 you began working from home primarily. What was the reason for that change?
09:49 A. I moved out of state, and so there wasn't, you know, an office. It was more than an hour away from the office.
09:49 Q. So at that point you wouldn't come into the office really regularly? It would just be anytime you were in town, or when would you come into the office?
09:50 A. Correct, if I was in town, and only if, you know, while I was in town I wanted to work from the office. A lot of times I would work from my daughter's house. But it was flexible.
09:50 Q. So you didn't have to come to the office when you were in town? It's only if you wanted to?
09:50 A. That's correct.
09:50 Q. How often would you say you went into the

sorry. I mixed up dates. I have that as a later date. Then I guess we are talking about senior only. Okay. Sorry.

09:52 MS. BROWN: No problem.

09:52 Q. So going back, Ms. Harrison, so can you kind of explain, I guess, kind of the life cycle or the phases that a senior project manager would be involved with with an implementation of ExecuTime software?

09:52 A. Sure. So, you know, once the -- the project is assigned to the project manager implementation consultant team, the PM -- is it okay to refer to project manager as "PM"?

09:52 Q. Sure.

09:52 A. Okay. So the PM would be responsible for hosting a stakeholder's kickoff call with the client. Prior to that call, the project manager will have reviewed a questionnaire that typically is provided by sales initially. And during the transition over to the project manager, it's completed.

09:53 So we would review the questionnaire. We would, you know, read the contract, understand the number of powers or the type of contract it was. We would map out an implementation timeline for the IC that we're assigning that project to, you know, based on their current availability. And so we're basically

prepping for the stakeholder call so that we could review all of this documentation on that call.

09:53 Once we have the stakeholder presentation, it would be up to the project manager to stay in communication with the client, to give them an opportunity to review the timeline, you know, make sure that that lines up with their current schedules and priorities. And then ultimately we're requesting sign-off on that timeline before we start to engage the implementation consultant.

09:54 While we're waiting on that signature, there were templates that were preconfigured based on the type of implementation and the way the client was hosted. So if they were on premise or if they were a SAS client or an ASW- -- or AWS cloud, there was different templates that you would choose from in Jira, which was a ticketing system.

09:54 And so you would go in and clone whatever template best fit that project. And there were about 32 tasks that the PM and the IC would have to go through through the life cycle of the implementation.

09:54 And so since it's a template that we were cloning, we would have to go in and rename the initial template to whatever the client's name is, and then we would have to go in and manually touch each task and

rename it so that it doesn't read "template," but, in fact, it reads, you know, whatever the client's name is and whatever that task to be completed was.

09:55 Throughout the life cycle of the implementation, we had to keep those tickets up to date with the number of hours or even minutes spent on working that particular task. We had to copy our email conversations regarding that task into the ticketing -- into that task ticket in order that the conversation happened so that it would be easy to read.

09:55 We would have to -- every time, of course, we spent time on that particular task, we would have to update that task with the amount of time spent and basically just keep notes there so that if anyone came in and needed to step in for us, they could very easily, you know, reference where the project left off.

09:55 So once we -- we have that signed, implementation timeline, at that point we would host a kickoff call to introduce the IC to the client.

09:56 And, I'm sorry, I need to back up just a second. So from the questionnaire, the project manager was also responsible for taking that questionnaire and producing what we called a scope of work or a -- yeah, pretty much a scope of work. And it basically -- or solution design is another term for it. But we

basically would outline based on what they answered in that questionnaire what we would be implementing, you know, what our pilot users would be, how things would be phased out.

09:56 You're pretty much putting together a synopsis of what you're going to deliver to the client. And that's also something that would have to be signed off on with the timeline.

09:56 So once you have all those documents and you start to -- you introduce your IC, the PM would then be responsible for just managing the project. Anything -- the budget. Anything that came up during the implementation as, like, an escalation, we would -- the project manager would be the one to communicate that with the manager of implementation to come up with an action plan for moving forward. So I guess you would call that, like, issue resolution or escalations.

09:57 Q. Now, what about after the implementation progressed? If there's a go-live period, what's the project manager's responsibility during that period?

09:57 A. Sure. So it's actually really the IC's responsibility to keep up with that go-live. For the most part, the project manager is just communicating and making sure that we stay on track for that date. You know, if the IC runs into any complications where they

feel like, for whatever reason, they're not going to meet the date that we set, we would work directly with the ICs on -- on a solution to that. A lot of times management would be involved in that as well.

09:58 Also, as a project manager, you know, we were responsible for, you know, allowing new hires to shadow us to get experience and help with projects that we're currently working on. We were training new hires.

09:58 Q. And this would be new-hired PMs?

09:58 A. Or ICs. During that -- my tenure, during that time, it was just myself and one other lady that had the most seniority. And so during that time period, we had five or six new implementation consultants. So we all kind of had to, you know, pitch in and assist with getting them up to speed so that we could come off the road, because we were also -- myself and Jessie Bell, another project manager there, we were doing a lot of the IC work as well just because there was so much turnover.

09:59 And we constantly, you know, had so many new people at one time, we were having to travel and do on-site trainings and, you know, remote trainings and things like that that the ICs typically would do under the Tyler umbrella.

09:59 Q. And so was there a difference in duties between

a project manager and a senior project manager?
09:59 A. There was not. I think that's just a title they gave me because I had been there for so long. I didn't -- I mean, I don't think it was a promotion, but maybe so. I didn't even know that my title had changed. I had to ask about it.
09:59 Q. I think you referenced that there was one other project manager there at that time. Is that right?
09:59 A. There were a couple of other project managers at that time, but myself and Jessie Bell had the most seniority at that time. We had both been there five, six years; whereas, everyone else were within, you know, anywhere from six months to maybe a year, year and a half.
10:00 Q. Was Jessie Bell also a senior project manager?
10:00 A. She was, uh-huh.
10:00 Q. How many project managers total were there at one time?
10:00 A. During that time frame, there was -- I'm going to say four; however, one of them was actually the manager of implementation, but she was working as a project manager as well because we were so -- you know, so short-staffed.
10:00 Q. And the manager of implementation, would that have been your supervisor?

10:00 A. That is correct.

10:01 Q. And who was that?

10:01 A. Hillary Pasch.

10:01 Q. And so there were three project managers, plus Hillary as the manager of implementation.

10:01 And then how many implementation consultants at one time would you have?

10:01 A. Are you referencing as a team or how many I would be responsible for at one time?

10:01 Q. Both.

10:01 A. Okay. So as a team, we had five implementation consultants, and I always managed one implementation consultant at a time.

10:01 Q. Did other project managers have multiple implementation consultants that reported to them at one time?

10:02 A. Yes.

10:02 Q. But you didn't? You only had one?

10:02 A. Correct.

10:02 Q. And why was that?

10:02 A. Just at that time, everyone was -- there was only one person that had two implementation consultants. Everyone else had just the one. So there weren't any extra for anyone to have more than one.

10:02 Q. You said Hillary Pasch was the -- was your

manager. Did that change at all during your time as senior project manager?

10:02 A. It did. So it actually started off as Jamie Burns and then became Hillary Pasch. And I don't know the exact date that Hillary became my manager.

10:03 Q. When you were describing to me the project manager's responsibilities during an implementation, you mentioned that there were some documents that had to be signed off on.

10:03 Who would be signing off on that? Would that have been the client, or would that have been your manager, or did it depend on the document?

10:03 A. For the specific documents I was discussing at that time, the timeline, that -- that would be the client signing off accepting the timeline.

10:03 And then the same thing with the solution design. That would be the client signing off on that saying they accept and understand, you know, what our scope of work would be.

10:04 Q. So the solution design, that was something that a project manager would create after reviewing the questionnaire completed by the client?

10:04 A. Correct. It was a -- I mean, it was a templated document, and there would just be -- we would just go, you know, fill in the blanks.

one screen and the solution design on another. We would have had calls and things like that to go through the questionnaire as well. I think I left that off. Again, you know, I haven't worked in that position for a couple of years now, so I'm a little dusty, but ...

10:06 So we'd basically have the two documents on two monitors. And based on what we have from the questionnaire and what we obtained from the solution design call, we would go -- you know, pretty much just go in and type into the template the -- whatever lined up with the questions -- line the questions up with the template for the solution design. In some cases, you can copy and paste, but a lot of it was manual entry, like, data entry.

10:07 Q. And then was there information in the solution design that you would remove if not applicable to the client based on their answers to the questionnaire?

10:07 A. Yes.

10:07 Q. And you said you had calls to go through the questionnaire?

10:07 A. We did.

10:07 Q. Would these be calls between yourself and the client?

10:07 A. Yes. We would have a call with ourself and the client to go through their questionnaire and get more

in-depth answers to the questions that they answered or, you know, validate any information that we didn't understand from the questionnaire that they filled out. There would be a call to go through that. There would also be a --

10:07 Q. And who would be on that call?

10:07 A. Sure. That would be myself and the client.

10:08 Q. So in advance of that call, you would have reviewed the questionnaire to see if there was anything on there from the client that you didn't understand that you needed to discuss on the call to the client?

10:08 A. That is correct, yes.

10:08 Q. Okay. And then based on that analysis and that phone call, you'd be able to complete the solution design?

10:08 A. You got it.

10:08 Q. And then also creating the -- I think you referred to it as an implementation timeline. How would you go about creating that document?

10:08 A. I would pull up my implementation consultant's calendar. Since I only worked with one, you know, I pretty much know what her schedule would be and when she would be available.

10:08 So I would just go through and pick dates. The timeline was also a template, and so -- with

predecessors in there. So once you put in a date, it would pretty much prepopulate what the timeline would look like based on the predecessors that had been set up. And so I would just make any manipulations if, you know, dates fell on a date that I've already got her traveling or scheduled to do trainings or whatever the case may be.

10:09 If it was a client that was requesting on-site training, once I have the dates for potential on-site for those particular sessions, wherever they fell in the timeline, I would usually put together an email for my IC and just let them know, like, these are the dates that it's looking like you would train -- you know, travel for these types of trainings. You know, let me know if there are any conflicts, you know, outside of work or whatever that would prevent them from being able to travel on those days.

10:09 And then once I receive that information back, you know, I would update the timeline accordingly, and -- and that's what I would use to present to the stakeholders.

10:10 Q. And who would the stakeholders be there?

10:10 A. The clients, the actual clients. Usually the client's director or IT would be a stakeholder. HR would usually be considered a stakeholder.

10:10 Q. So in this timeline document that you would be creating, were there phases that were just standard to every implementation, or did the phases or training differ based on each client's implementation?

10:10 A. The phases would be pretty standard, but what the client would need in those particular phases is what would -- would differ.

10:10 Q. So how would you know what the client would need for a particular phase in order to complete the timeline?

10:11 A. It would be based on, you know, things discussed during the solution design call. Usually it's -- usually in that way, because the phases were the same. But what they need -- for instance, you know, they may not use overtime or shift differential or something like that.

10:11 So when we would actually get down to the training, we would tailor that training specific to that client. If they don't use overtime, well, we're not going to show overtime. That type of thing.

10:11 Q. So you said based on the solution design call, you would -- you would have that as an understanding of what specific needs the client would have for the different implementation phases.

10:11 Are these the solution design calls that

you referenced earlier where you would go through the questionnaire?

10:11 A. Yes.

10:11 Q. And so these were calls between yourself and the client?

10:11 A. Yes.

10:12 Q. So you've mentioned training for clients as well. Did you conduct training as a project manager?

10:12 A. I did, quite a bit.

10:12 Q. It sounded like there were different kinds of trainings that each client might have as part of the implementation. Is that right?

10:12 A. Yes. I mean, they typically all have the same training. So they have, you know, a timekeeper training. Those are going to be what we would refer to as basic users or hourly employees. So everyone would have a basic -- or -- yeah, basic user training.

10:12 Everyone would have a supervisor training, where we would work directly with the supervisors. And they would have to go through the basic user training as well as supervisor training since they would be users themselves but would also be, you know, supervising subordinates.

10:13 And then everyone had an admin training. Usually the admin training would just be with IT and

using overtime impact the training that you would provide?

10:16 A. I don't know that it would impact it. I mean, it would just -- we just would not include that in their training session. We just would omit that, that part of it. We would hide the configuration so that it doesn't even show, and then we just wouldn't cover it during the training session.

10:17 Q. Were there other client-specific needs or contract terms, I guess, that would impact their training?

10:17 A. Yes.

10:17 Q. What would those be?

10:17 A. So some clients would -- you know, we adopt the train-the-trainer approach. So our goal was to create SMEs, or subject-matter experts, on how to use the application, and then they would go out and train the other users that can phase it out by department or however they want to do that.

10:17 But there were some clients that preferred we train all their users. And so their projects would last longer because, you know, some of our -- their clients were pretty big, and it would take weeks to train all their users.

10:18 You know, some clients just couldn't

handle the training. They had been in the position for so long, and so we would have to train them multiple times, you know, for them to gasp the changes.

10:18 I'll think of some other scenarios. I would say those are two of the biggest things, you know, clients wanting us to do all of their training instead of becoming the trainers themselves. And then, of course, we -- quite a bit, we would have to retrain clients for either issues on their end, where folks weren't grasping things, or implementation consultants doing training prematurely, before being ready. And so we would have to go behind them and kind of clean that up.

10:19 Q. So you said some clients would want to hire to train all users instead of just train-the-trainer style.

10:19 A. Yes.

10:19 Q. In that scenario, would you have to adjust the implementation timeline to reflect a longer training period?

10:19 A. Yes. In some cases --

10:19 Q. And would you know --

10:19 A. -- we would do that up front -- I'm sorry.

10:19 Q. No, no, go ahead. Go ahead.

10:19 A. I was just going to say, in some cases, we knew up front that the -- that the plan was for us to train

involved pretty heavily.

10:23 Q. So you said you -- you involved them for go-live dates, for client complaints regarding implementation consultants, or client requests for you to do training.

10:23 Other than those specific examples, can you think of other times where you involved management?

10:23 A. If a contract was originally written for remote training and the client later decided they want on-site.

10:24 Q. Any other examples you can think of?

10:24 A. Not that I can think of.

10:24 Q. And then you also said that sometimes you would have to train a client multiple times or retrain them based on an issue.

10:24 Who would make the decision that a client needed to be retrained or trained again?

10:24 A. Management.

10:24 Q. And would you tell them, I guess, during one of your check-in calls that it was your, you know, opinion that this client needed to be retrained or trained again?

10:25 A. I wouldn't make any recommendations either way. I would pretty much just discuss the complaint, and management would make a decision, because I wasn't allowed to make -- usually if there was an issue with a

training and it had to be redone and it's because of, you know, an IC or whatever, that would be considered non- -- nonbillable. We wouldn't be able to bill the client for that. And so those decisions came from management. So I would just, you know, state the complaint --

10:25 Q. If you had --

10:25 A. Uh-huh.

10:25 Q. I was just going to ask, if you -- it would be, I guess, on you, though, to alert management that there was this complaint from the client or something going on, right? Management wouldn't be aware otherwise?

10:25 A. Right, unless the client bypassed me, which usually I had a pretty good rapport with my clients. Right, it would be -- the complaint would come to me, and I would, you know, let management know.

10:26 Q. And then -- this is kind of, I guess, built off of that. When you had these calls with clients -- we talked kind of about the initial kickoff call that you would have to go over the questionnaire.

10:26 Would you have weekly check-in calls with the client during implementation as well?

10:26 A. Yes. Depending on the number of hours in their contract, if it allowed for that, yes, I would have weekly calls scheduled as well.

10:26 Q. And who would be on those weekly calls?
10:26 A. Usually just project management and the client -- or project manager, rather, and the client.
10:26 Q. And then if clients did need to be retrained or trained multiple times, that would require you to go back and adjust the implementation timeline?
10:27 A. Not -- not all the time, because usually I -- I would build buffer room around the training session to give, you know, the clients the opportunity to go back and -- we recorded our trainings and provide -- every training was recorded and provided to the client.
10:27 And so, you know, we would want to build buffer room into the timeline to make sure that they have an opportunity to go in and watch the recording and get in the system and play around with it. So not every time, no.
10:27 Q. And then how would you account for buffer time when you were building out an implementation timeline?
10:27 A. Usually it -- you know, it helped because our ICs were always booked back to back. So a lot of times we couldn't help but put the buffer time in.
10:27 But usually it was based on blackout dates provided by the client. It would -- we would, you know, look at what else the IC has scheduled, and then we -- the timeline that we were using, like I said, had

predecessors in there, so it would automatically build in that buffer room based on -- management created the template and provided it to us, so it was built into the timeline, and we would just adjust it even more, if need be, because of availability.

10:28 Q. Were there ever instances where you look at a client and you would just -- you would know based on, I guess, either the size of the client or the project, that that client was going to need more time than what the standard was in an implementation timeline and you would adjust it accordingly?

10:28 A. Would you mind reasking that question?

10:28 Q. Sure. It was kind of clunky.

10:28 So I'm -- I'm assuming that all clients -- not all clients were the same size or same complexity when it came to implementation.

10:28 So sometimes when you were dealing with a larger client or a more complex implementation, would you go ahead and adjust that implementation to kind of give yourself additional buffer room?

10:29 A. Yes.

10:29 MS. BROWN: Okay, if you want to take -- I don't know. Matthew, how long do you want to take for a break? Is five minutes, ten minutes okay?

10:29 MR. HERRINGTON: Let's do ten.

I would be on-site for a week at a time. There were other times when I would be on-site for weeks at a time, home on the weekends.

10:40 Q. And when you traveled to the client's site for these trainings, who all from Tyler would be there for those trainings?

10:40 A. Usually just myself. Usually myself. There were rare occasions where I would have an IC with me.

10:41 Q. And when you conducted these trainings, tell me a little bit about -- I guess, about how they worked. Would it just be, like, you in a conference room with, like, a PowerPoint up there and walking through -- the different client representatives through parts of the implementation software, or what exactly --

10:41 A. No.

10:41 Q. -- would it look like?

10:41 A. Sure. So, no, we would actually -- if we were going on-site to do training, then that training was going to take place in the client's test instance of ExecuTime. Therefore, we would configure it based on the items that we would be training on while we're on-site. We would -- we would configure the system prior to being on-site.

10:41 And then usually, correct, the client would set us up usually in a conference room or at the

courthouse, in a -- just in an empty space. And usually there -- it would be a classroom-type setting. A lot of cases, they would have computers set up so that as you're going through the training, you can pause and let users log in and do things as well.

10:42 And we would, you know, be standing in front of the class, and we would have a TV or a projector, or what have you, connected to our laptop, and we would conduct the training in their training environment. In some cases, we would be at city hall, and the trainings would be recorded by someone, by the client's staff, so -- but it was always in a classroom-type setting and within their actual system.

10:42 Q. You said you would configure the training before you went to the client's site; is that right?

10:42 A. Yes, that is correct.

10:42 Q. Explain to me what configuring it would entail.

10:43 A. Sure. So there's -- in ExecuTime there were a few imports that would take place. So we would import employee demographics, phone numbers, addresses, you know, employee status, that type of thing. But then if they were using -- if they were using, let's say, overtime or shift differential, we would actually have to go in and configure that.

10:43 If they weren't going to have users

clocking in and out, we would have to go build security walls to say, you know, okay, this particular employee's going to clock in and out versus these employees are going to do manual time sheet entry.

And usually you would -- you would configure both types of scenarios, so that if it's one of the initial trainings, where a client doesn't know exactly which option they're going to choose, you can show both, you know, to give the client a better idea of what their options are. And then, you know, they can make a decision from there.

So we would have to build, you know, security permissions. We would have to go in and build overtime rules and shift differential rules. We would go in and prepopulate time cards so that when we're going through the training, we're not actually clocking in and out or doing time entry. We're basic- -- we'll show how that functionality works, but then we can go and show them how the time card would look based on the time entry type that's -- that's chosen.

Q. So it sounds like some of the configuration that you needed to do you might learn during an initial training with the client, but would other, I guess, instances of configuration that needed to occur, would -- how else would you figure that out if it wasn't

through an initial training?

10:44 A. Yeah, so during training, usually the client can identify, Oh, well, we forgot about this.

10:44 It's almost impossible to capture everything in the solution design. And then also once they have a better understanding of how ExecuTime can be configured, and they realize that not every department has to do things the same way, a lot of times we would leave those trainings and have to go back and make adjustments based on the client's new understanding of what their options are.

10:44 Q. So some of it would come through the solution design; some of it would come through training as it evolved?

10:45 A. Yes.

10:45 Q. And what would that look like? The client coming to you and saying, You know, after seeing this feature, we want -- we want to change it this way, and then you would go and configure the setup?

10:45 A. A lot -- yes.

10:45 Q. And then I guess for the customization, you would know through the solution design? That's something that you would just, I guess, learn from going through and reviewing the solution design that you created from their questionnaire?

going to be up on the screen when you're doing these trainings?

10:46 A. It would be their system. So they would have our laptops, which we would be able to -- if they were hosted on our server, then, you know, we would be able to just pull them right up. But we would be in their system from our laptop, which is connected to a projector or a TV.

10:47 We would produce a basic user training manual that was created as well as a supervisor manual. And so we would provide those documents. But they were -- you know, we would let them know they're generic. They're not specific to their -- you know, to their office, I guess, and that, you know, there may be things in that document that wasn't configured because they let us -- they told us that they don't use it, but it was still -- it was still provided.

10:47 Q. And did you ever -- for any clients, did you ever update those manuals to be custom to their specific implementation setup?

10:47 A. No. No, I wouldn't -- I wouldn't make adjustments to the manual, but I did used to keep just, like, a generic Word document, you know, letting them know that, you know, you guys don't use this, you don't use that, so that when they are going to maintain the

system after go-live, they would -- they would know that that's not a setting they have to do when they bring a new hire into the -- into the application.

10:48 Q. Okay. So you kept, like, a -- your own Word document that you would give to the clients that would let them know what wouldn't apply or what would apply?

10:48 A. That is correct.

10:48 Q. So we talked about how you would have weekly check-ins with the client if that was something that their budget -- had they budgeted for in their contract.

10:48 Did you ever have clients where you would have more than just a weekly meeting, like, biweekly meetings or multiple times a week?

10:48 A. Not prescheduled, but maybe on demand. If I had a client that was, you know, a little more -- needed a little bit more attention, I would have, you know, multiple calls, just ad hoc calls, but not predetermined, that I can recall.

10:49 Q. And with that initial kickoff call you'd have with the client to go over the questionnaire, how long does that call usually last?

10:49 A. Anywhere between an hour -- about an hour, hour and fifteen minutes.

10:49 Q. And other than training, did you ever travel for other job duties?

10:49 A. Yes.

10:49 Q. What other job duties did you travel for?

10:49 A. I -- I've been asked to travel with sales a time or two. They were going to do analysis or demos with a potential client, and so I was asked to be there just to kind of field any questions related to specific functionality. You know, the meeting would be the sales team, and she would pretty much let me know when she needed me to step in and assist with answering questions.

10:50 There were times where I was sent for other potential clients, myself and other Tyler employees, to do analysis on, again, potential clients. They just kind of wanted to know, you know, what options and functionality they have in ExecuTime. And it was more just a formal meeting just to kind of go through and answer questions that they had. Yeah, I think that's it.

10:50 Q. And as far as you know, did other senior project managers also travel with sales to potential clients for these kind of, I guess, advising on functionality purposes?

10:50 A. As far as I know. I do not know.

10:51 Q. And this was -- was this something that you were selected for because of your experience with

request it, and then management would come, come to me.
(Exhibit 2 marked.)
10:54 Q. Okay. I've shared what will be Exhibit 2 with you. Do you see that in front of you, Ms. Harrison?
10:54 A. Yes, I do.
10:54 Q. And do you recognize Exhibit 2?
10:54 A. I do.
10:54 Q. And is this a résumé that you had prepared?
10:54 A. Yes.
10:54 Q. And it looks like you prepared this while you were still working at Tyler in the senior project manager role. Is that right?
10:55 A. Yes.
10:55 Q. I wanted to ask you about some of the bullet points that you had included in this résumé.
10:55 Do you see about halfway down, on the first set of bullet points under senior project manager, there's one that starts with "Manages, monitor, and motivates"?
10:55 A. Yes. Yes, I do.
10:55 Q. Okay. And it says, "Manages, monitor and motivates the cross functional team assigned to each project."
10:55 Who would -- who would be the cross-functional team that you're referencing there?

10:55 A. Sure. So it would be the implementation consultant that I'm working with; it would be the team responsible for deploying the software to the servers; it would be any technical contacts that are -- that are helping with establishing the email configuration within ExecuTime so that the email server talks to ExecuTime, sends notifications.

10:56 The technical team would also assist with time clock setup that needed to be done on a server so that my IC could actually train on the time clock. The technical team would also assist with any type of technical calls that we had to discuss server specifications required for the installation of ExecuTime, those type of things. So it's typically Tyler, Tyler teams.

10:56 Q. Okay. And that would consist of the implementation consultant, the deployment team, and the technical contacts?

10:56 A. Correct. And I would include management in that as well because, you know, sometimes we would have to get them involved if, you know, an installation couldn't happen sooner, you know, as soon as we needed. We would have to go to management for management to go to the manager of, you know, those teams to kind of get things pushed through.

Q. And so when you said you managed the cross-functional team, how would you be managing those different groups?

A. We're still managing the communication between all groups so that we're all on one accord and can set, you know, appropriate expectations.

Q. And that would be all, I guess, with the purpose of getting this implementation done, you know, on schedule, within scope?

A. That is correct.

Q. What about "monitor and motivates"? How would you do that?

A. So there were some times where we would have to put tickets in to have things done. And so I would monitor the ticketing system to make sure that -- because when you initially enter a ticket, it's in just -- in a pool with other tickets that have to be assigned or pulled from that queue. Excuse me.

And so I would just monitor to make sure that that's happening in a timely manner and it's been assigned to a representative, so that once it's assigned to a representative, I know who I can go in and touch base with as to when it will be completed.

Q. And then what about the "motivates"?

A. That would just come from, Hey, team, you know,

can -- it would be great if you can kind of get this done by this date; the client has expectations of such-and-such from sales. You know, just trying to, you know, just promote a healthy working team morale.

10:58 Q. And you were often, I guess, out of that team, the one that had the direct client contact, so you were aware of what the client's expectations were as far as progressing and the schedule?

10:58 A. Exactly.

10:58 Q. And then a couple of bullet points down -- it looks like -- one, two, three -- the third bullet point down from that one, there's a bullet point that says, "Creates and delivers customized ExecuTime client training sessions via the web and/or on-site visits to ensure client satisfaction and product knowledge."

10:59 Do you see that?

10:59 A. I do, yes.

10:59 Q. How were the ExecuTime clients' training sessions customized?

10:59 A. Sure. So just kind of going back to what I mentioned earlier, it's just, you know, we have a list of -- a template list of what's covered under each training session, and then you're basically just omitting whatever doesn't apply to the client.

10:59 Q. And you would -- I think we talked about

11:01 Is that "internal staff" a reference to Tyler employees as well?

11:01 A. Yes, ma'am.

11:01 Q. So the training you did, you did the client training, but it sounds like you also trained Tyler employees. Tell me a little bit about the internal training you did. What would that have covered?

11:01 A. Sure. So usually it would be a specific function. It wouldn't be, like, an entire basic user training or supervisor training. If I was training a new project manager, I'm kind of -- I'm training her on -- you know, or training them on just processes here and there.

11:01 What management would do would -- is whenever we had a new project manager or IC, they would schedule time for that new hire with each person on the team, you know, just to kind of get acclimated with them and see how they do things, because pretty much every project manager did -- you know, kind of did their own thing.

11:02 I mean, we all had templates and processes and things like that, and, you know, we had a guide that we had to follow, but there were some things that -- that we did differently, I guess you could say. And so it would just have other PMs or ICs that are new hires

shadowing myself.

11:02 And then management would also take the new hires through a series of training, and they would take -- you know, have them learn a small piece of ExecuTime, and then the new hire would train management on that. And management would ask us to sit in and critique the new hire, pretend that we were a client, so as the new hire was going through training, we might interrupt them and ask them a question or ask them to clarify something just to kind of see how they would handle that based on how we knew our clients respond to us.

11:02 Q. And so when it says "internal staff," you put in parentheses there "new and existing."

11:03 So was it new hires and then also existing Tyler employees that you would train?

11:03 A. Yes.

11:03 Q. Tell me about the existing Tyler employee training you would do.

11:03 A. Sure. So when new functionality came out, there will be times where management would assign, you know, that new functionality to anyone on the team to, you know, get to know it and train the rest of the team on it. So it would be, like, new functionality or -- pretty much that's all it was, would be new

functionality.

11:03 Q. So can you give me an example of maybe a new functionality that you learned and then trained other teammates on?

11:03 A. Sure, I can. So there was -- let me see the best way to explain this. So in the payroll processing part of ExecuTime use, they added a feature that was called "adjustments," so that once they ran the move to payroll, they moved the hours out of ExecuTime into payroll, there was a new adjustment tab that was added to the payroll functions portion of ExecuTime, so that if -- let's say during the move to payroll process, you identify a minor change that -- that needed to be made before you move the hours. So, for example, you put in vacation, and it should have been sick time.

11:04 Well, through the adjustment feature, you would be able to go in, make that change to the pay type that was used, from vacation to sick. And then through that adjustment functionality, you would be able to say whether you want to go ahead and mark that one transaction as processed, that you really technically already moved the hours for that pay period, or if you want to move that -- that transaction again from ExecuTime into payroll.

11:05 And that was something that I --

management wrote a modification on. Dev developed it. They asked me to review it and -- you know, just to make sure it made sense. And then once it was rolled out into the application, I was asked to train on it.

11:05 Q. Okay. So you kind of, like, reviewed it to see if there were any bugs in it first. And then once that was cleared, you trained on it?

11:05 A. So more so reviewed it to make sure that -- well, I guess you can say bugs, but just to see if I ran into any hiccups. And, more so, just making sure that the process makes sense, like, you know, the -- you know, from a -- from a client standpoint, the functionality made sense.

11:05 Q. And so then when you trained other implementation team members on the new functionality, what would that look like? Would they -- you just set up, like, a virtual training with them and walked through how they could use it so they would be able to train on it with their clients?

11:06 A. Correct. It would be like a 30-minute call, if that.

11:06 Q. And when these new functions would come out, would that impact the -- the implementation timeline?

11:06 A. Not at all, because it may not even be applicable to the clients that we're implementing. I

mean, I -- I maintained anywhere from 19 implementa- -- 19 to 23 implementations at a time. It may or may not impact the existing clients or the current clients that I was working on. It was more so just knowledge share.

11:06 You know, we wanted to always have knowledge sharing going on amongst the team and making sure that everybody knows what's available, what's new and -- you know, new to the software, so that as they're training clients, they can incorporate that into their training sessions.

11:07 Q. And in the next bullet point down, you said, "Continuously consults with Stakeholders regarding their specific company operations in order to recommend best utilization and customization of ExecuTime configuration."

11:07 What recommendations would you be making regarding utilization and customization of ExecuTime?

11:07 A. Sure. So as we're configuring security roles, so when you build a -- or security permission role in ExecuTime, you typically want to, you know, try as best you can to encompass security setup based on a group of individuals, so that if you have 200 employees, you don't want to have to create 200 security roles to accommodate how they're going to use ExecuTime.

11:08 You would -- the preference would be to

create a security role, and that one security role would be applicable to multiple users, so that once you create that role, you can go into the user profile, assign that security role, and, you know, that knocks out, you know -- I don't know -- 30 of your users. And then you may have to create another security profile that matches how the next 30 or 25 users are going to use ExecuTime.

11:08 So it's basically making recommendations on what ExecuTime could do for them so that they're setting it up in a way that it won't become a maintenance nightmare, so to speak.

11:08 Q. Gotcha.

11:08 Other than the security setup, are there other examples of recommendations with respect to utilization or customization of ExecuTime configuration that you would make?

11:08 A. Uh-huh. There were other areas of the application that held the same type of -- based on how you set the system up in reference to the available functionality is going to determine what it's going to take to maintain the system going forward, as you have, you know, people terminate or new hires come in or rehires or whatever the case may be.

11:09 So a lot of the recommendations would be, Okay, based on what I'm hearing, this group of employees

system. And so then we would put a ticket in, and we would put specifics in that ticket as to when we would need that task completed by.

And then usually they would communicate back if they weren't going to, you know, be able to make that date, or if they could pull it forward. You know, they wanted to verify that was okay.

But, yeah, it would be primarily emails, or we would use the Jira ticketing system.

Q. And when you said "assigning responsibilities," what does that look like? Is that you telling the implementation consultant what part of the project they're going to take on, or what exactly?

A. Yep, it would be that. You know, yeah, exactly, because even with, like, time clocks, you know, you know, we would have to specify -- Okay, you know, technical team's going to do the server setup and make sure that one clock is up and running, and then, you know, you're responsible for making sure that you train for that one clock and that IT knows how to go in and set up the remaining clocks.

So, you know, again, based on the number of hours in the contract, we may have -- there are some -- in some cases, we would do a lot of setup for the client. But if it was a smaller client or they

purchased smaller hours, then I would work with the IC to help them understand that, Okay, since we have a smaller budget to work with, these are things that you'll do, and then this is what you need to try to push to the client in order to, you know, make sure that we don't exceed the budget or have to go back and ask for additional time.

11:13 Q. And then the second complete bullet point on this second page, it says, "Efficiently and competently manages problems, changed requirements, missed deadlines, etc."

11:13 What problems would you be managing?

11:14 A. If something was missed. If, you know, a technical call didn't take place and, you know, they didn't understand that they were supposed to have something completed by a certain date. Usually I would have to go back and communicate that back to management so that -- you know, that management could work with the manager of the team that would actually complete that task to see if we can get it pulled forward or, you know, get it done.

11:14 If the user -- I'm sorry, the IC got in and started doing training, and, you know, they were receiving errors all over the place or deadlocked, you know, messages or something like that, I would have to

communicate that back to technical teams and management to work through those issues.

11:14 You know, there's been times where we got on the phone to do training and it's obviously the client isn't paying attention. So just things of that nature.

11:15 Q. So it sounds like, you know, there's a variety of different problems, and depending on what the problem was, you might have to loop in a different person to help resolve that problem. Sometimes it might be management; sometimes it might be tech support, it sounds like.

11:15 A. That's correct.

11:15 Q. Is that fair?

11:15 A. Yes.

11:15 Q. Okay. And then you said "changed requirements." What were -- what are you referring to by "changed requirements"?

11:15 A. That would be, you know, if a client were to, you know, go from wanting -- go from the web-based trainings to on-site training, or if they're requesting additional time for training because they want us to train their users. So it would be changes to the solution design.

11:15 So, typically, once they signed off on

implementation assigned to you, I guess, selecting the IC to work through that implementation with you?

11:17 A. No. I had an assigned implementation consultant. And so I -- that was the only implementation consultant that I was -- that I was booking for. That was the only resource that I would -- that I would, you know, schedule for as far as implementation consultants.

11:17 Q. So what was -- oh, I'm sorry. Go ahead.

11:17 A. No, that's okay. Go ahead.

11:17 Q. So what would happen if the implementation consultant that you typically worked with was not available to take on a new project or maybe didn't have the experience to handle the implementation?

11:17 A. In most cases, I would fill in. If I wasn't able to fill in for whatever reason, then at that point we would go to management, and management would talk to other project managers to see if their ICs had any flexibility.

11:18 And a lot -- in a lot of cases, especially during that specific -- you know, the specific time frame that we're talking about, they -- we had a lot of new people. So it was kind of easy to pull in someone else because it was an opportunity for them to test what they'd been learning and then also kind of get their

one of these other ICs that had been borrowed be mixed into those 20 different projects?

11:19 A. Yeah, for me, it was always the one IC.

11:19 Q. Can you think of an instance where you had to pull another IC in from a different project manager?

11:19 A. I cannot, huh-uh.

11:19 Q. Did you ever request one?

11:20 A. Honestly, I don't remember.

11:20 Q. And when you say there that you ensured resources are sufficient, what are you referring to by that?

11:20 A. Pretty much just making sure that -- you know, whatever the timeline we were producing, that we had the appropriate resources available for the dates that are outlined in the timeline.

11:20 Q. And so that would be, you know, staffing appropriately as well?

11:20 A. Yes.

11:20 Q. This next bullet point, you say, "Assists with onboarding process for new hires through recruiting, interviewing and hiring."

11:20 Explain to me a little bit, I guess, about your role in the recruiting process.

11:20 A. Sure. So in the recruiting process, I -- during my time at Tyler, I referred, and they hired,

gosh, probably seven -- seven to nine employees. So recruiting would be actually just more so, you know, people that I worked with in the past that were looking for different -- new opportunities. You know, I sent their résumé on to management for consideration.

Q. Do you remember who specifically you recruited to Tyler? I know we talked about Ms. Greene.

A. Yeah. Ms. Greene, Latisha Harrison, my sister; Jim McMain. There was a Nichole -- or Nichole Schrader (phonetic). She's no longer with Tyler. There was a Krista Bailey. She's no longer with Tyler. I'm trying to think who else. So maybe it was five employees. I feel like there was more, but I can't think of the names.

Q. When you said you would interview new hires, tell me about that and your responsibility there.

A. Sure. So usually anytime management had, you know, done the first, initial interview, if it was someone that they felt would be a good fit, they would ask the team to do a team interview with that candidate. And they would provide a -- they provided a list of questions to help facilitate and drive conversation with the new hire.

And so we would kind of do a roundtable with myself and other project managers, and even in some

cases, implementation consultants, where we would spend about 30 minutes just getting to know the candidate, trying to get a feel for whether they would be a good fit or not.

11:23 Q. And then after you had this roundtable with the candidate, would you provide your recommendation as to whether to hire or not to management?

11:23 A. Not a recommendation. It would be -- they would ask us to -- of the candidates that we interviewed, they would ask us to put them in order as to who we would choose or who we would like to see join the team. You know, put them in order based on, you know, who we liked the most, second most, third -- third, that type of thing.

11:23 Q. And would you provide any explanation, or was it just, like, a strict, like, one through four?

11:23 A. I would probably provide feedback, because we would have them do, like, a -- like, train us on something. So I may say something, like, you know, they seemed to do well under pressure; or they -- you know, she was very organized; or, you know, when they were doing the presentation, they weren't moving the mouse all over the screen. So, you know, those are good indications of a -- or, I guess, indications of a good trainer, I would say. So, yeah, sometimes I would

provide some feedback.

11:24 Q. And then when you say you assisted with hiring, tell me about what you did there.

11:24 A. So with hiring, well, that would probably be the -- that would be the feedback that I'm -- that I'm providing, is that, you know, this person ranked one; this would be my second choice; this would be my third choice. Management would collectively review everyone's responses and then make a decision.

11:24 Q. And so this bullet point that is three down from the last one we were looking at says, "Analyzed, provided recommendations, documented and tested system feature enhancement with Tyler-ExecuTime Director in Product" -- or "Tyler-ExecuTime Director of Product Strategy & Operations."

11:24 Tell me about what your responsibilities were with respect to this bullet point.

11:25 A. Sure. So clients would submit enhancement requests all the time as to how they would like to see the software function a little differently, and so management would create modification definitions, you know, if it was one that's accepted, whether it's, you know, Hey, this is a great modification for all of our clients; we're going to add it, no problem, but it will be -- you know, whenever; or there were some times

where, you know, some clients had more pull than others, and so we would -- they would pay to have modifications added to the software.

And so occasionally management would ask us to kind of review those modifications and, again, you know, get in the system, play with the feature, test it, you know, make any recommendations, if needed.

So, for example, the adjustment modification that we spoke about, that was initially a client request. And it was one of my clients who requested that functionality, so management ultimately asked me to review it based on my understanding of what the client was requesting and just provide, you know, any feedback, if any. That may have happened, you know, once or twice.

Q. Did you provide any feedback about the adjustment feature after you had looked at it?

A. Yeah. I remember that one specifically. There -- there -- I didn't run into any issues, and I -- and I loved it. I think the only thing I responded was that it works great and it was going to be a game changer.

Q. So what would reviewing that feature entail?

A. Sure. Just going through the modification definition and then logging into ExecuTime. You know,

you wouldn't -- you wouldn't really be able to modify that on that single transaction. You would actually have to build five different time-off requests.

11:28 And there was a feature written to where once you create that, it would create a breakout of each day. So then you could go in and modify whatever day you needed to modify. Maybe you were taking a half day on Wednesday; but Monday, Tuesday, Thursday, Friday, you're taking a full day off. So that would be the other feature.

11:28 Q. And do you recall what you did to review that one? Was it similar? Just going -- logging in and testing it and playing around with it as a beta user?

11:28 A. Yes, that's correct.

11:28 Q. And did you have any feedback for management after you reviewed it?

11:28 A. No. Just, again, that I felt like it was, you know, pretty slick and it was going to be a game changer for a lot of our clients.

11:28 Q. So in this next bullet point, you say, "Identified and escalated incidents to development and/or management when needed."

11:29 A. Uh-huh.

11:29 Q. So when you say "when needed," were there certain, I guess, incidents that you felt like shouldn't

need to be escalated because you could resolve it individually or -- I guess, kind of tell me about when a certain incident would need to be escalated versus not.

A. Sure. So when the issue is reported, if I could go into our ticketing system and find an enhancement request, or maybe that issue has already been reported by another PM or IC, or even through support -- maybe it's a known issue -- then I wouldn't have to escalate it. I would just add the client that I'm working with that's having the same issue to that ticket so that when the issue is resolved, I would be notified to schedule an upgrade for the client so they could receive the fix. If I couldn't find a ticket, then at that point I would put the ticket in and escalate it.

Q. So these incidents that you're referring to here, are these all kind of, I guess, like, technical incidents or ...

A. Yes. Usually, it's -- yeah, definitely. It's, you know, the system -- the client's working with the system. They're receiving an error, or, you know, the functionality isn't working as expected. Those would be the incidents I'm referring to.

Q. And were there instances where, you know, a client was receiving an error message and you were able

to talk through it with the client and figure out maybe they had, like, done something wrong in how they were using the software, so you were just able to talk them through, you know, how to actually use it appropriately to resolve that error message?

11:30 A. Yes, definitely. Usually it was just a misconfiguration within the application. There were -- you know, as dev, you know, discovered other things, you know, they would produce documentation on -- Hey, you may -- your client's on this version and service pack of ExecuTime, and they're using shift differential. Please note that there's a known error, or whatever.

11:31 And same thing with, like, workloads. They may say, you know, If your client receives this error, you have to go into the server and restart the services, or, you know, they would have already documented the steps to resolve that issue as a temporary work-around.

11:31 Q. So sometimes you would be able to consult these development documents, I guess, and see what was causing the error message for the client.

11:31 And then I guess sometimes was it just kind of, like, common sense; you knew based on your experience with ExecuTime, they just needed to do something differently?

11:31 A. That's correct, yes.

11:31 Q. So this next bullet point, you said, "Analyzed, recommend and document system development priorities for new ExecuTime features and change requests submitted by customers."

11:31 What are you, I guess, referring to when you say "document system development priorities"?

11:32 A. So a lot of times when we would report issues that were coming up, they would have to be, you know, worked on by development. The product owner who -- Hillary, who at one point was my supervisor, became the ExecuTime product owner as well, so she worked directly with the development team on issues that we were reporting back that required development's help.

11:32 And so a lot of times she and other managers would ask us, you know, what's the client's temperament? Where do we feel the priority level is?

11:32 And, you know, they'd pretty much ask us so that they would know how to go back and kind of put things in order based on priority and how that particular issue was going to impact the implementation. If it was a showstopper for the client, you know, then management would have to definitely get involved and see if they can get development on that issue sooner than later.

11:32 Q. Okay. So when you said "analyzed, recommend and document," it's kind of assessing of the client priority with the issue and the impact it would have on the implementation?

11:33 A. Correct.

11:33 Q. And then a couple of bullet points down, there -- it looks like just a couple, yeah -- two down, it says, "Responsible for identifying and analyzing user requirements, procedures, and problems to improve workflow."

11:33 What -- what are you referring to in that bullet point?

11:33 A. Sure. So as we're working with the clients, if we -- you know, as we're working with them, just based on our experience, if they -- I don't even know how to word this. I guess just kind of like when we go on-site and do analysis and clients -- we're showing them what ExecuTime can do. And as we're doing that, we're having conversations with the client, and they're telling us, Well, this is how we do things.

11:34 And so we're coming back and saying, Okay, well, you know, to get the system to do what you're asking and to automate this process, you know, these are the configuration changes that we're going to have to do in ExecuTime, and this is how we're going to have to

split employees into different groups so that we can configure the application to function, you know, the way that it needs to based on their classification.

Q. Okay. So --

A. And a lot of times -- I'm sorry.

Q. No, go ahead. Go ahead.

A. Well, no, I was just going to say, a lot of times, you know, that would cause the client to have to go back and do some reengineering of their business processes, which was to be expected. Most of our clients came from paper timekeeping. And they were going to electronic, so changes would have to be made, and they recognized that.

Q. So "analyzing user requirements" would refer to, I guess, kind of learning about the client's business and processes, and it's applying your knowledge of ExecuTime to under- -- to explain to them how it would work with their specific protocols and policies?

A. Correct.

Q. And then sometimes that would result in the client needing to change certain, I guess, procedures they had?

A. Yes, that is correct.

Q. Can you think of a specific instance where a client had to go back and change a policy or procedure

based on your discussions with them?
11:35 A. I mean, I can't think of a specific time, no, but, I mean, it would -- it would happen all the time just because, again, you know, what their expectations of the software are doing versus what ExecuTime could actually do. That was a continuous, repetitive conversation that we would have with clients, and they would have to make adjustments accordingly.
11:36 Q. But you can't recall any specific adjustments that clients had to make?
11:36 A. Well, I mean, the specific adjustments would have to be the classification of the security roles and things that we spoke about earlier.
11:36 Q. But that's stuff you're doing on Tyler's side. Is there anything that you're aware of that clients had to go do on their side after you had those conversations with them?
11:36 A. Oh, I see what you're saying. I'm sorry. I see what you're saying. Okay. Let me think about this for a second.
11:36 I mean, the only thing I could really think of is, like, if the client was expecting to be able to require a certain group of employees to do manual entry or clock in and out and then later realized that -- because they actually have to have access to a

computer or a time clock. And these users work in the field. They don't report to an actual location.

11:37 They would have to go back and say, Okay, never mind. You guys are not going to clock in and out with a manual entry. We're going to prepopulate a time card for you.

11:37 And then at some point, you know, within the two-week or the one-month pay period, whatever the case may be, the user would have to make sure that they access the application at least one time and approve the time card.

11:37 So I guess to summarize, you know, making changes based on how they're expecting to do time entry for certain groups.

11:37 Q. Any other changes you can think of that clients have to make?

11:37 A. Well, they -- yeah, they would make changes to when they run payroll, because, again, you know, they were used to having paper time cards, and they had a timekeeper or someone that manually went in there and keyed everyone's time, verified it, to now having an automated process.

11:37 So instead of having to do the payroll processing, you know, by Monday at 12 a.m., they were able to extend that a little bit more because everything

was electronic. But that would be it.

11:38 Q. The next bullet point, it talks about analysis you did for City of Buffalo, New York, Public Safety.

11:38 And I think -- is that analysis what we were talking about earlier where you did the demo with sales?

11:38 A. That's the one --

11:38 Q. I know --

11:38 A. Yeah. The demo with sales, that was -- I think that was Troy, Michigan, we went to. This instance at Buffalo was when myself and a Tyler -- another Tyler project manager went on-site and sat down roundtable with the team and discussed just, you know, what ExecuTime offers and -- as far as functionality and whatnot.

11:38 They threw scenarios at us, and we talked through -- spoke through how we can -- how we could accommodate that in ExecuTime and whether it would be something we can automate or not.

11:39 Q. And then with the "Assists sales team as aid during multiple sale demos onsite as well as over the phone," that's what we were talking about earlier where you said it was Troy, Michigan?

11:39 A. You got it. And there were --

11:39 Q. Okay.

Where -- I'm sorry. Where are you seeing "supervising"?

11:55 A. So I -- maybe it's not referring to the project manager. But right under where it says "Travel: 50%" and then "Job Description," in that second line under "Job" -- it says "and allows supervisors to closely manage overtime, job costing."

11:55 Oh, I guess it's talking about the ExecuTime solution. I'm sorry.

11:55 Q. Okay. Yeah, that's what I understand --

11:55 A. Okay. My apologies. Then, yes.

11:55 Q. Okay. So Exhibit 3 is an accurate reflection of the job duties you had as a senior project manager?

11:55 A. Yes. From what I can tell, yes.

(Exhibit 4 marked.)

11:56 Q. I've shared with you what is -- can you see the Exhibit -- or I guess it's an email titled "Implementation Checklist." Do you see that?

11:56 A. Yes.

11:56 Q. So we'll mark that as Exhibit 4, and I'll let you take a look at it. Let me know, after you've had a chance to look at it, if you recognize it.

11:56 A. Okay. Would you mind zooming back in?

11:56 Q. Oh, okay.

11:56 A. It made it a little --

11:56 Q. Is that better?

in."

11:58 A. Uh-huh.

11:58 Q. Who was Trey, or who is Trey?

11:58 A. Sure. Trey Griffin [sic] was my implementation consultant at that time.

11:58 Q. Okay. And then in that second paragraph, the second sentence says, "Not sure if this will be useful or not but I thought I would send it to you. Meredith expressed the same concern during my one on one with her."

11:58 A. Uh-huh.

11:58 Q. Who is Meredith?

11:58 A. Meredith was another project manager during that time.

11:58 Q. And you said you had a one-on-one with Meredith. What was the one-on-one meeting that you had with her?

11:59 A. Sure. Meredith was a new project manager. And so management would set up, you know, quick, 30-minute meetings for us to kind of touch base, for her to ask any mentoring-type questions she has from a project management perspective.

11:59 Q. How often did you have one-on-ones with Meredith?

11:59 A. I don't recall.

Q. Was it more than just the one reference in this email?
A. Meredith didn't last very long. She didn't stay very long. So it might have been one other time, but I don't -- I really don't recall. She wasn't there for long.
Q. Did you have one-on-one meetings with other new project managers?
A. Not necessarily scheduled. Like, in passing, you know, we might chitchat about projects. I'm trying to think. There was another -- I think her name was Stephanie. She was another new project manager. So I may have met with her once or twice.
Q. And so scrolling down here, it looks like this is a list that you had put together of the various, I guess, milestones or actions that would occur during an implementation?
A. Yes.
Q. Did you say yes?
A. Yes. I'm sorry. Yes.
Q. What was the purpose for you putting this list together?
A. So that Trey would know, you know, what he could work on simultaneously instead of, you know, move to the next task once another task had been completed.

Usually there were multiple tasks that needed to be, you know, working simultaneously in order to meet the implementation timeline. And we were having issues with --

12:01 Q. And then --

12:01 A. Uh-huh, yeah, we were having issues with balls being dropped, so I was trying to help.

12:01 Q. So you created this to kind of give Trey some additional guidance as to what he should be doing, when, essentially?

12:01 A. Yes, ma'am.

12:01 Q. And it looks like -- scroll down -- parentheses before each item, and it's got "PM" and then "IC." And I'm assuming "PM" is for project manager. So that would be a duty that you would be responsible -- responsible for. And then "IC" would be implementation consultant. And those would be the duties that they were responsible for?

12:02 A. Yes.

12:02 Q. And then it looks like there's, like, these bars in here between different parts of it.

12:02 A. Uh-huh.

12:02 Q. What was the purpose of putting that bar in there?

12:02 A. Just to kind of separate or lump those tasks

12:04 A. Yes.

12:04 Q. And then down here, we have "Timeline and Integration Approval." Again, that's, I guess, the implementation timeline we've been talking about that the client signs off on?

12:04 A. Yes.

12:04 Q. And then here, there's this "Go Live Checklist and Milestone signatures." I don't think we've talked about that.

12:04 Can you tell me a little bit about that responsibility?

12:04 A. Sure. So the go-live checklist is a checklist that -- it's a checklist template that we would provide to the client for them to kind of go through and make sure that they've, you know, tested various functionality throughout the application to ensure they're ready for go-live.

12:04 We would also require milestone signatures. So the milestones were built into the timeline template so that as we reach different phases of the implementation, a/k/a milestones, we would have to obtain sign-off before we would move to the next grouping of milestones.

12:05 Q. Did you have issues where a client wouldn't sign off on different milestones?

12:05 A. Yes.

12:05 Q. And why would that be?

12:05 A. It would be a decision of theirs, that they -- you know, maybe they didn't feel comfortable with training; they feel like they need more time for testing; they're not happy with functionality that's not available in ExecuTime.

12:05 Q. And so what would be your response as a project manager?

12:05 A. To -- to work with management on -- on how -- on a resolution for that. If they're not happy with training, you know, offering other options; or, you know, if there's an enhancement request that they want put in place in order to go live, you know, working with management on solutions to those issues.

12:06 Q. Okay. And then you would relay, I guess, the solutions or make sure they're carried out so that the client could, I guess, proceed with the different milestones and get their sign-off?

12:06 A. Yes.

12:06 Q. And then this next item below is "Write payroll export design and assign to Dev," which I assume is development.

12:06 Tell me a little about what you would be doing with that responsibility.

we -- we always gave the client two instances -- two or three instances of ExecuTime. And so everything is, you know, configured, trained -- whatnot, in training. And then we would have to establish a production cutover, basically meaning that we're going to take all of our configuration from the testing instance and put it into the production instance. And, you know, at that point, that's when we're expecting the client to go live.

12:08 Q. So what would be your responsibilities during that phase?

12:08 A. Just to make sure that the client signed off on the milestones and they've signed off on all their trainings; they have, you know, any type of recordings that were promised; they feel comfortable and confident with moving forward.

12:08 And then once that's then established, I would just -- I would create a ticket for our technical team and basically let them know what date we're expecting everything to be copied to production.

12:09 Q. And then this next item is "Schedule Transition to Support Call." What's that?

12:09 A. During that time, myself, the client, Jamie or Hillary, and then the customer support manager, we would all get on a call, and the managers would talk to the client about -- primarily, the support manager would

12:11 Q. So what would you have to do when you were closing out all PSA tasks?

12:11 A. Just close -- close out the tasks so that we can no longer add billing against it or, you know, add hours against it.

12:11 Q. So after you sent this checklist to Jamie, what happened with it?

12:11 A. I think we just -- if I remember, we just kind of -- we counseled Trey on some of the things that we were running into and just -- you know, she'd met with him and just, you know, kind of let him know that, you know, these are the things that we're running into and what's causing delays in the implementation and, you know, that -- honestly, I'm trying to remember.

12:12 I don't know if we met with him or if there was an email that was sent. But, basically, we just worked with Trey on, you know, better understanding, you know, what things he can work on simultaneously versus, you know, which ones were dependent on another.

12:12 Q. Was this document shared with any of the other implementation consultants?

12:12 A. I believe Jamie did share it. I'm not -- or -- I don't know. I don't remember if she shared it or if she updated the tasks. I think that's what it was.

Q. And then over in this Client Resources column, there's different -- or, sorry, ExecuTime Resources column, there's different options, it looks like.

Would you have determined which resources associated with each task?

A. No. That was part of the template.

Q. So is there a reason that -- scroll through it. This one, the project manager is listed primarily for most of the tasks.

Is that typical?

A. It's not. So -- well, wait a minute, because I can't remember when Palm -- when Palm Desert was implemented. For some reason, I feel like that was prior to the time of acquisition. And when I first started with ExecuTime, the PM was the IC. So we did everything as far as managing the project, the timeline, on-site training, Windows training and everything. So that might be why. I don't recall when this client was implemented.

Q. So who had access to this document other than a project manager?

A. Management would have access to it, and the client would have access to it.

Q. Did implementation consultants have access to it?

12:17 A. Oh, yes. I'm sorry. Yes. At the time when we actually had implementation consultants, yes, they were provided a copy.

12:17 Q. I think we talked about earlier how ExecuTime was acquired in June of 2016. And it looks like the dates in this project plan are 2017.

12:17 A. Uh-huh.

12:17 Q. Was it -- was it your understanding that in 2017, 2018, they still hadn't broken out the project manager and implementation consultant role?

12:17 A. Yeah. If it was -- yeah, I want to say it was getting closer to that 2018 year that they started breaking that role out, if I'm not mistaken.

12:18 Q. So there's this tab down here labeled "Imp Billing," which I --

12:18 A. Uh-huh.

12:18 Q. -- assume is for "implementation billing."

12:18 A. Uh-huh.

12:18 Q. Do you see that screen in front of you?

12:18 A. I do.

12:18 Q. And it looks like there's various individuals listed under the "Completed By" column.

12:18 A. Uh-huh.

12:18 Q. Hillary, yourself, and Trey.

12:18 A. Okay.

12:18 Q. We established earlier that Trey was an implementation consultant; is that right?
12:18 A. That is correct.
12:18 Q. So it looks like Trey would have been working on this implementation?
12:18 A. Yes, I agree.
12:18 Q. And so where -- were you responsible for, I guess, managing this tab of the spreadsheet where there was a breakdown of hours?
12:19 A. Yes.
12:19 Q. And how would you do that?
12:19 A. So ... Gosh, I don't even -- primarily, going through the Jira tickets and just confirming. So as you work the tasks -- a task in Jira, you would, you know, like I said, enter your time that you're billing and close that task out. And so I would just line this up with the tasks in Jira.
12:19 Q. And the tasks in Jira, would they have this description that's under the "Task" column? Is that where this pulled from to --
12:19 A. Yeah. It's probably -- it's probably a summary of, but -- let me see. Let me look at -- let me make this a little bigger. I'm sorry. One second. (Reviewing document.)
12:20 Some of them are the same and match up to

the task, and some of them are -- well, weekly calls -- yeah, they do -- they do match with Jira.

12:20 Q. Okay. So you just would consult with Jira and pull the tasks description out and the amount of hours that were recorded in there?

12:20 A. Correct.

12:20 Q. And it says -- in this column over here labeled "Billed Out," there's "yes" entered for it looks like all the -- almost all the tasks. There's one down here in row 97 that says "no charge."

12:20 A. Uh-huh.

12:20 Q. What -- what, I guess, tasks were billable, and which tasks were not billable?

12:21 A. So, I mean, that was on a case-by-case basis. And for the most part, it would be, you know, whatever -- you know, some things, we would have to go to management.

12:21 But, you know, I think I mentioned before that we would have to update the tasks with the client's name. That wasn't something that would be billable. Us spending time to copy our email strand into the task, that wouldn't be considered billable. If I was working with Trey on, you know, understanding something so that he could train or meet with the client, that wouldn't be considered billable. The checklist I put together to

assist him on knowing what to do and when, that wasn't billable.

12:21 Q. And so was it something you just kind of used your judgment on as to whether to bill it or not?

12:21 A. Between myself and -- and Jamie, we -- we would have conversations about, you know -- yeah, like, you know, what are some of the issues that we're seeing and, you know, go back and forth about, you know, what we can do to help.

12:22 Q. So the entry in here that wasn't billable --

12:22 A. Uh-huh.

12:22 Q. -- it looks like "internal discussion regarding export change needed" --

12:22 A. Uh-huh.

12:22 Q. -- would that have been recorded in here as well, and then you, after discussing it with Jamie, would come back and mark it as nonbillable?

12:22 A. Yes.

12:22 Q. And was the purpose of maintaining this document so you could tell how much billable time the client had left for their implementation?

12:22 A. Yes.

12:23 Q. If we look up at the top of this document, it looks like they had purchased 80 hours, and they have just under five hours remaining?

12:23 A. Yes.

12:23 Q. What -- I think we talked about this earlier, but just to make sure, what happens if they run out of time?

12:23 A. Management would, you know -- we -- management would pretty much assess what's remaining or what's left to be completed in the implementation. In some cases, they would create a -- I forgot the acronym that they use, but it was pretty much a nonbillable task just to kind of get the project complete. But if it was a substantial amount of time that would be needed, then management would, you know, reach out to sales and request a change order for additional hours or give us approval to request additional hours.

12:23 Q. Okay. And that would all be triggered by, I guess, once you have updated this tab or this spreadsheet tab and finding out that they're out of hours?

12:24 A. Well, we -- I mean, I would probably touch every project almost daily -- if not daily, every other day -- just because there's so many things going and so many people pulling from the budget. So, you know, you pretty much had to stay on top of that.

12:24 So, typically, once I saw the client got down to a certain number of hours, maybe 15 or 20, I

would assess and then start those conversations with management.

12:24 Q. And it looks like here maybe there was some time that was compensated with -- that you had spent with Hillary?

12:24 A. Yes.

12:24 Q. And what would that have related to, if you recall?

12:24 A. I don't. I don't know.

(Exhibit 6 marked.)

12:25 Q. Okay. I've shared with you what will be Exhibit 6. Do you have that in front of you, Ms. Harrison?

12:25 A. I do.

12:26 Q. Let's go over to this implementation timeline tab. Is this another example of an implementation project plan or a timeline that you would have created as a project manager?

12:26 MR. HERRINGTON: Amanda, I'm going to interrupt you for just a moment. Will you clarify for me whether the spreadsheets that you're introducing as exhibits, whether all of the tabs within it constitute the exhibit or -- you know, or just what you've shown in the video?

12:26 MS. BROWN: I was contemplating the entire

12:28 A. Oh. Yes. Yes, yes, yes. That is correct. We would be -- there would be a project manager assigned on the client's side as well.

12:28 Q. Okay. And that's who this contemplates signing?

12:29 A. Yes. There is a place for both project managers to sign, but typically we would -- we would not print these off and sign off on them and store them anywhere, from what I recall. I don't -- I don't recall ever signing a checklist.

12:29 Q. And then going over to this implementation project plan tab, this one looks a little different than the one we just looked at as Exhibit 5 in the sense that this one has more implementation team entries than Exhibit 5 did.

12:29 A. Uh-huh.

12:29 Q. Do you -- do you have an understanding of why different client resources were allocated on different implementation timelines?

12:29 A. Yeah, the only thing I could -- only other thing I could think of is whenever Trey's start date was, and maybe he wasn't, you know, well versed in doing some of those tasks, so I had to fill in for him, because that -- that was the case. There was times where I'd travel on-site for him and -- et cetera. So

12:30 that's the only scenario I can think of. I'm not sure when he started, but that could be the case.
12:30 Q. So sometimes, depending on the resources that you had available to you, you kind of had to modify this implementation timeline to reflect --
12:30 A. Yes.
12:30 Q. -- the resources available?
12:30 A. Right, correct.
12:30 Q. And then it looks like here there's an "Implementation Services" tab. And that, again, would contain the time spent or reported for this implementation?
12:30 A. Of the billable portion, yes.
12:30 Q. And it looks like there was a division of tasks between yourself and Trey?
12:30 A. Correct.
12:30 Q. And do you recall, I guess, approximately how long Trey was the implementation consultant you worked with?
12:31 A. I don't even know. I don't know that -- Trey might have been there a year, maybe a year and a half. I don't recall exactly. But I will say that Trey was my first IC once they split those positions, so ...
12:31 Q. Okay. And you think he was there for about one year?

12:31 A. About a year, I believe, uh-huh.

12:31 Q. And who did you have as an implementation consultant after Trey?

12:31 A. Suzanne Greene.

12:31 Q. And how long was she your implementation consultant that you worked with?

12:32 A. Maybe three months.

12:32 Q. And then who did you have after Suzanne?

12:32 A. I want to say they were in the process of getting me a new IC, and shortly after that I transitioned into a new position. I wasn't assigned another IC after Suzi. Was I? I don't think so.

12:32 Q. So who did you work with as an IC after Suzi left before they assigned -- since they were looking for someone to assign you?

12:32 A. I didn't work with an IC. I was pretty much ... Yeah, I wasn't assigned another IC. I was pretty much working my projects on my own for that short period of time.

12:33 Q. Who was --

12:33 A. I'm sorry. There was so much turnover, so it's a little cloudy. I'm sorry?

12:33 Q. I can help you, I think.

12:33 A. Okay.

12:33 Q. Do you recall working with Brian Ledbetter?

12:33 A. Oh, my goodness. Yes. I could not think for the life of me. Yes. I am so sorry. Yes.

12:33 Oh, no.

12:33 Q. So did you work with Brian --

12:33 A. Can you give me one moment, please? My iPad is dying. Can you give me one moment, please? Okay. I'm sorry. I'm ready.

12:33 Q. No, no, that's no problem.

12:34 So when did you work with Brian? Was that after Suzi?

12:34 A. Yes. Brian would have been after Suzi.

12:34 Q. And how long did you work with Brian?

12:34 A. I don't recall when he started, but he would have been my IC up until the point where I transitioned to my new position November of 2019.

(Exhibit 7 marked.)

12:35 Q. I've shared with you my screen, and you should have an email in front of you that will be Exhibit 7.

12:35 Can you see that, Ms. Harrison?

12:35 A. I do.

12:35 Q. Okay. And if you want to take a minute to look through it, just let me know if you want me to scroll down. I just want you to be able to see the entire chain.

12:35 A. Yes. (Reviewing document.) Okay. (Reviewing

document.) Okay. (Reviewing document.) All right. (Reviewing document.) Okay. (Reviewing document.) Okay. (Reviewing document.) All right.

12:37 Q. That's the end of it. Do you recognize Exhibit 7?

12:37 A. I do.

12:37 Q. And is this an email chain between you and the client regarding updating the client's implementation timeline?

12:37 A. Yes.

12:37 Q. And it looks like -- down to the bottom where you initially emailed the client, you say, "Attached is an updated copy of the Implementation Timeline and below are the changes made."

12:37 What changes were you making to this implementation timeline?

12:37 A. I mean, it sounds like there was some misunderstanding as to what phase of the implementation the client was on. I probably had had a call with Brian, and so we were updating actual dates as to when they parallel test versus go live.

12:38 Q. And do you recall how you were alerted to the issue with, I guess, the misunderstanding as to the phases?

12:38 A. I do not.

12:38 Q. And when you updated this timeline to, I guess, clarify the phases as to when they test and go live, is that something that you had to provide management before you did?

12:38 A. Yes.

12:38 Q. And what did that look like? Did you just shoot an email to Hillary or Jamie and say, you know, I'm updating to clarify the confusion on the implementation phases?

12:38 A. Yes, that appears to be how I addressed it.

12:39 Q. And so is this email at the top here to Jamie regarding a new timeline based on information Brian gave -- is this you asking or, I guess, letting Jamie know that you'd made the update?

12:39 A. Yes. We likely already talked about it. Like I said, we would touch base often, and so we would talk through things that we ran into such as this. And once I made the change, I likely emailed Jamie to let her know.

12:39 Q. So you would have told her, you know, something along the lines of there is some confusion, it sounds like, with the phases of the implementation; I'm going to update the implementation timeline; and she would have said, like, okay; and then you would have gone and done it?

12:39 A. I don't know that it would have gone that smooth. She would have wanted to know why; you know, what the issues were; is it on our end; is it the client's end; is it something that, you know, we dropped the ball on. There would be more in-depth conversation about -- as -- you know, as to why the go-live date is being moved.
12:40 Q. Okay. So you'd have to answer some questions for her as to why the go-live was being moved?
12:40 A. Yes.
12:40 Q. And was -- moving the go-live date, was that considered a significant change?
12:40 A. Yes.
12:40 Q. And why is that?
12:40 A. I can't answer why, but we were asked to report those changes to management.
12:40 Q. Were there other changes to the implementation timeline that you didn't have to report to management?
12:40 A. Only if -- you know, if there was a conflict. Someone's not available, to a date-change move, or, you know, something's not being completed, you know, based on the time frame that I'm asking it to be done.
12:41 Q. So if there were conflicts or date changes or something not being completed, those were areas you had to run by the -- had to run by management?

12:43 Q. And do you have a sense of how many weeks that translated to?

12:44 A. It would have been three or four full weeks, more than likely.

12:44 Q. And when you're on-site with a client, what hours would the -- well, first off, I guess I shouldn't make that assumption.

12:44 When you were traveling those three or four weeks in 2019, would that have been for training?

12:44 A. Yeah. A combination of -- yeah. Well, yeah, training. It would definitely have been training.

12:44 Q. And when you're at a client's --

12:44 A. Well, I would say training and on-site configuration. I apologize. Training and on-site configuration.

12:44 Q. So when you were traveling to a client for training or on-site configuration, what were the typical hours that you would meet with the client?

12:44 A. It varied. Some clients wanted 7:00 to -- you know, 7:00 to 4:00 or 5:00. Others wanted 8:00 to 5:00. It varied.

12:45 Q. And what about with on-site configuration?

12:45 A. The same.

12:45 Q. Were -- as a project manager, you were responsible for making sure that the implementation

stayed within budget, correct?
12:45 A. Correct.
12:45 Q. How did you do that?
12:45 A. Just by managing the budget. You know, frequent check-ins with the IC.
12:46 Q. So it would be using that kind of tracker that we looked at as part of the implementation timeline and then frequently checking in with the IC about the hours that they were spending?
12:46 A. Right, and reviewing Jira tickets.
12:46 Q. And then if the project was getting close to, like, exhausting the allotted hours, would you talk to the implementation consultant about making sure that they were careful with the hours they were billing?
12:46 A. Yes.
12:46 Q. Did you ever have a situation where you would look at a Jira ticket and see how much an implementation consultant had billed to a client and it didn't seem correct to you?
12:46 A. Yes.
12:46 Q. What would happen in that situation?
12:47 A. There would be internal conversations with management as well as the implementation consultant.
12:47 Q. So you would escalate that to management to address?

12:47 A. Yes.
12:47 Q. And in some instances, would that time be written down or written off?
12:47 A. I mean, if we found it justifiable for whatever reason, then, no, it wouldn't. We -- you know, we would just kind of roll with it and manage things going forward. And then in some instances, yes, NB tasks would be created, and the IC would be told to report the next hour to whatever -- to that NB task to kind of balance things out.
12:47 Q. And when you were looking at the tickets and you would see one where maybe the hours didn't seem right, is that just based on kind of your experience with these implementations, knowing how long it takes to do certain tasks?
12:48 A. Yes.
12:48 Q. How were the different implementations assigned to project managers?
12:48 A. Through management. Management would get a project and assign it to whichever team had the bandwidth.
12:48 Q. How is -- if you know, I mean, how did they know what bandwidth different teams had?
12:48 A. I don't know. I mean, I know they knew how many projects -- projects each person had. There were

times where management would come and say, Hey, do you think you can take another one? But, for the most part, I mean, you had to take it.

12:48 Q. I think earlier you said you had, like, upwards of 20 projects at a time. Is that right?

12:48 A. About 23, uh-huh.

12:48 Q. Twenty-three. And was that typical for the other ExecuTime project managers?

12:49 A. No.

12:49 Q. How many did other ExecuTime project managers typically have?

12:49 A. I mean, some had as little as, you know, 12 or 13. I think Jessie Bell would probably be right up there with myself, where she would maintain, you know, anywhere from 18 -- 18 or 19 projects at a time.

12:49 Q. Do you have an understanding of why you had more projects than other project managers?

12:49 A. I mean, not really, outside of just having -- you know, being a senior project manager.

12:49 Q. So senior project managers handled more projects at a time?

12:49 A. Yes.

12:50 Q. And was that -- did you feel like you were able to handle more projects at a time because you were more experienced on the project -- or more experienced with

implementation?

12:50 A. Yes.

12:50 Q. So earlier we were talking about you traveling to different client sites for training.

12:50 Did you have certain days blocked for travel?

12:50 A. Yes.

12:50 Q. What days did you have blocked off for travel typically?

12:50 A. Again, that varied. It just kind of depended on what the client requested. Sometimes they would want me there Monday morning, at the start of the day, so I would have to travel on Sunday. And they would want me there all day Friday. So, you know, if I wanted to, I could travel later that night on Friday, or I would just wait on Saturday and fly home. It just -- it varied.

12:51 Q. Were there some implementations where you would fly in on Monday and then fly out on Friday?

12:51 A. Yes.

12:51 Q. And so you would be on-site Tuesday through Thursday?

12:51 A. No. When we flied in on -- when we flew in on Monday, we would -- well, in most cases, when we flew in on Monday, we would, you know, check in with the client and then go to that office that afternoon of that

12:54 A. Yeah. Some, yeah. We were just running into issues where timeline tasks weren't being met.

12:55 Q. So Brian just wasn't accomplishing what he was supposed to accomplish per the timeline?

12:55 A. Right. And if I -- there were some complaints on the training and, you know, the client feeling like they knew more than -- you know, more than Brian or my IC, so ...

12:55 Q. So these were -- was the client coming to you with their complaints about Brian?

12:55 A. Yes.

12:55 Q. And then you were, I guess, trying to escalate them here to Jamie?

12:55 A. Yeah. Trying -- not -- well, yeah, I guess, escalate. But, more so, just trying to come up with an action plan to help get Brian on the right track.

12:56 Q. And did you have, like, weekly check-in calls with Brian when he was working with you?

12:56 A. Yes.

12:56 MS. BROWN: I know we've been going about another hour. Do you guys want to break for lunch now, maybe for 30?

12:56 MR. HERRINGTON: Fine with me.

12:56 THE VIDEOGRAPHER: Off the record, Ms. Brown?

01:35 Q. I think that's the end.
01:35 So do you recognize Exhibit 9?
01:35 A. Yes.
01:35 Q. And this is an email from yourself to Trey Griffiths on Wednesday, August 15th, 2018?
01:35 A. Yes.
01:35 Q. And you sent this email to Trey kind of summarizing the different projects you guys have together, and the status; is that right?
01:35 A. Yes.
01:35 Q. And you were just -- when you were sending this email, was this to make sure he was aware of the different responsibilities and deadlines related to the project?
01:36 A. Yes.
01:36 Q. And in the end of the introductory paragraph, you say, "I'm sure I will send this to you at least two more times before the end of the week."
01:36 Did you check in with your implementation consultants multiple times a week?
01:36 A. Yes, when needed.
01:36 Q. And when you say "when needed," were some periods of time more involved than others and maybe -- or maybe some implementation consultants needed more hand-holding? What do you mean?

01:36 A. Yes, exactly what you've stated. Some implementation consultants needed more hand-holding.
01:36 Q. It looks like there's some feedback kind of sprinkled out throughout the different project summaries. So here under Harrisonville, Missouri, you say, "In the future when scheduling a troubleshooting ticket with support please coordinate a go to meeting the person who has the ticket."
01:37 Had there been issues with, I guess, Trey not following up on troubleshooting tickets?
01:37 A. Yes. So the idea behind that was that management wanted the IC to work with the support rep that's helping them address an issue for knowledge transfer purposes.
01:37 Q. Okay. So here you're just coaching Trey to make sure he's working with that support rep?
01:37 A. Yes.
01:37 Q. And did implementation consultants submit troubleshooting tickets regularly?
01:37 A. Yes.
01:37 Q. Did they have to come to you before they submitted troubleshooting tickets?
01:37 A. Yes.
01:38 Q. And what -- what did that look like?
01:38 A. It was just a, you know, way for them to make

the client just so that it's a little bit more tailored to the client that we were sending the document to. It could have been also me building --

Q. Other than changing --

A. I'm sorry?

Q. Go ahead. Go ahead. I don't want to cut you off.

A. Oh, no. I was just saying, also, the documents like the solution design documents and the timeline, those are documents that -- that we would present during a stakeholder presentation.

Q. And then with these guides, other than updating, I guess, specific name of the client, what other changes, if any, would you make to those guides?

A. None, to my knowledge. We wouldn't make any other changes.

Q. So you were giving -- I apologize if I asked this already, but you were giving Trey kind of feedback and tasks to accomplish throughout this document?

A. Yes.

Q. I think we mentioned this earlier, but you said some implementation consultants required more hand-holding.

With the different implementation consultants you worked with, did you have a sense of

01:43 A. New implementations. New implementations. They may assign -- may assign some other small internal projects. I don't really recall. But definitely new implementations.

01:43 Q. So if an implementation consultant wasn't fully utilized, they could be assigned to another implementation, I guess, with a different project manager?

01:44 A. In rare cases, that did come up, but we didn't really run into a lot of issues where the ICs were underutilized.

01:44 Q. What issues would implementation consultants escalate to you?

01:44 A. Timeline changes, you know, requests for on-site training, requests to be retrained.

01:44 Q. Anything else that you can think of?

01:45 A. Possible bug-related issues that needed to be escalated or -- escalated -- escalated, and also maybe reviewed or, you know, looked into as a potential known issue or something that's already on dev's team radar.

01:45 Q. Would they ever relay to you any sort of delay by the client with regards to different milestones?

01:45 A. Yes.

01:45 Q. What would that look like?

01:45 A. Usually email or verbal conversation.

a meeting with Jamie to talk about Brian. And you said, kind of, We can still meet if you want, but it looks like you already went ahead and talked to him about feedback you had been getting? Is that right?

02:01 A. Yes.

02:01 Q. So what feedback did you provide to Brian?

02:01 A. At that time, you know, there were just complaints where the client felt like they knew more of the software than Brian. Some of the same issues that we were seeing with Trey, where things weren't being completed or followed through with.

02:02 Q. It looks like you told -- down in the third paragraph, you say, "I told him if there is anything I can do better to help him to let me know, even if that means scheduling more time with him."

02:02 So it looked like you were making yourself available to -- to Brian as a resource so he could try and improve his performance?

02:02 A. Correct.

02:02 Q. Did his performance improve?

02:02 A. Not while he was under -- under myself as far as being his project manager.

02:03 Q. Why were you sending Jamie this email about the feedback that you had given to Brian?

02:03 A. Jamie and I, as well as Hillary, had already

02:08 A. Yes.
02:08 Q. These are kind of the standard calls you had with her. There would also be impromptu calls throughout the week as well?
02:08 A. Correct.
02:08 Q. And it looks -- here on this next bullet point, you say, "Close email, Skype etc when sitting in on trainings with clients and internal presentations, weekly meetings, implementation calls etc if that helps keep you from being distracted."
02:08 So was this feedback that you were giving to Suzi based on, I guess, what you had observed from her during trainings and presentations and meetings?
02:08 A. No. That came from conversations I had with Hillary at the time that she was -- just things that she had noticed while Suzi was working under her. So some of that came from conversations Hillary and I had had as she was transitioning Suzi to be my IC.
02:09 Q. And Hillary had asked that you give Suzi this feedback?
02:09 A. Yes.
02:09 Q. Then it looks like the next bullet point talks about sending recap emails from trainings and meetings no more than one day after the call.
02:09 Was this based on your observations of

working with Suzi?

02:09 A. Yes. At that time, again, that was a topic that Hillary and I had discussed at the time that Suzi was transitioning. But I had also picked up on it as well during the short time she was my IC.

02:09 Q. You were giving her feedback on sending out timely recap emails?

02:10 A. Yes, ma'am.

02:10 Q. And then this next main bullet point says, "Answering calls for clients." And it looks like you're giving her some advice on how she can minimize disruptions from clients during her workday. Is that right?

02:10 A. Yes.

02:10 Q. And then there's a section down here that says, "Client related items." Are these the various projects that you were working on with Suzi at the time?

02:10 A. Yes.

02:10 Q. And the items that you have listed here underneath the various projects, are these kind of answers to questions that Suzi had brought to you?

02:10 A. I know for that first one, "NW Michigan Council of Government," that was from me observing, sitting in on calls.

02:11 Some of the things, you know, were things

that Suzi may have brought to me, and some came from just observing, observing some of her calls and picking up on incorrect information or what have you.

02:11 Q. So you were providing her with either answers questions -- answers to questions she had brought to you or observations based on her calls that you had observed where she had done something incorrectly or said something incorrect?

02:11 A. That is correct.

02:11 Q. Did you observe the calls implementation consultants hosted regularly?

02:11 A. No.

02:11 Q. Why were you observing Suzi's calls?

02:11 A. There were some things that had come up. And, again, when she transitioned to me, there were already some areas of concern.

02:11 Also, at this time when she was transitioning, these were clients that I had already been working with. And so in an effort to ensure the transition, the IC transition was smooth, I would sit in on the call.

02:12 Q. Had you talked to management about observing her calls?

02:12 A. I'm sorry. Was the question have I?

02:12 Q. Yeah. When -- had you had conversations with

Hillary or Jamie about observing Suzi's calls because of the performance issues that had been observed?
02:12 A. Yes.
(Exhibit 13 marked.)
02:13 Q. All right. I've shared with you what will be Exhibit 13. Let me know if you've got that in front of you. And I can scroll through whenever you need me to so you can see the whole document.
02:13 A. (Reviewing document.) Okay. (Reviewing document.) Okay. (Reviewing document.) Okay.
02:14 Q. Do you recognize Exhibit 13 as an email that you had sent to Jamie Burns with some feedback on Suzi Greene?
02:14 A. Yes.
02:14 Q. It looks like you're summarizing some complaints you had received from clients about Suzanne?
02:14 A. Yes.
02:15 Q. Okay. In the first email, you say -- it's the last sentence -- "The action items she's pending with Suzi, I have Brian working on them now, most of them we were able to know out."
02:15 A. "Knock out" I think is what I was trying to say.
02:15 Q. So --
02:15 A. Uh-huh.

Q. Yeah, that makes sense.

So Brian, that you're referencing in this sentence, that's the implementation consultant that we have been discussing earlier?

A. Yes, ma'am.

Q. Brian Ledbetter, I believe.

So were you having Brian work on some of the items that Suzi was having trouble completing?

A. Yes, during this time period. This was when Brian was stepping in to assist Suzi. I believe Suzi was out on leave.

Q. And then it looks like in this -- we'll scroll down -- Dearborn, Michigan -- or, sorry, Missouri, there is a second bullet. It says, "This clients weekly call wasn't on my schedule for yesterday 03/06 so I missed sitting in for this call even though it was in Hillary's recap to me about filling in for Suzi. I was wrapped up with working with Brian and it completely slipped my mind."

A. Uh-huh.

Q. Is this what you're saying where Suzi was out on leave, so you had taken over, I guess, her duties and were working with Brian on, I guess, kind of filling in for Suzi?

A. Yes.

02:19 Is it fair to say you were trying to help Suzi improve her performance?

02:19 A. Yes.

(Exhibit 14 marked.)

02:20 Q. Okay. I've shared with you what will be Exhibit 14. Let me know if you have that in front of you, and I can scroll through it so you can see the entire document.

02:20 A. I see it. I can see it. Oh, I'm sorry. You can scroll down. (Reviewing document.) Okay.

02:21 Q. So do you recognize Exhibit 14 as an email exchange between you and Jamie Burns about Brian Ledbetter's performance evaluation?

02:21 A. Yes.

02:21 Q. And Jamie was asking for you to give her your feedback on Brian that she could include in his performance evaluation?

02:21 A. Yes.

02:21 Q. I'm going to share with you the attachment to Exhibit 14, which is the Brian Ledbetter performance eval document.

(Exhibit 15 marked.)

02:22 Q. All right. Do you see that in front of you? We'll make that Exhibit 15.

02:22 A. Yes.

02:22 Q. And I can scroll through this so you can review it. Just let me know when you want me to scroll down.
02:22 A. (Reviewing document.) Okay. (Reviewing document.) Okay. Would you mind making it just a little larger for me?
02:23 Q. Sure.
02:23 A. Thank you.
02:23 Q. Is that better?
02:23 A. Yes, but now I don't know which square I'm on.
02:24 Q. I'm sorry. I think it was right around here.
02:24 A. Okay. Yeah, it's cut off on the left side.
02:24 Q. Hmm. Let me see if I can -- so it only shows one page. Let me make that page ...
02:24 A. Perfect. Thank you.
02:24 Q. That should be better.
02:24 A. Yes, it is. Thank you. (Reviewing document.) Okay. (Reviewing document.) Okay. (Reviewing document.) Okay. (Reviewing document.) Okay.
02:26 Q. I think that's it. Did you read it all? I'm sorry.
02:26 A. Yeah. I -- I remember it. Thanks. Uh-huh.
02:26 Q. So Exhibit 15 was the feedback that you provided to Jamie for Brian Ledbetter to include in his performance evaluation?
02:26 A. Yes.

02:28 A. Okay, I'm ready. (Reviewing document.) Okay. (Reviewing document.) Okay.

02:28 Q. All right. So is Exhibit 16 an email chain that you had with a client, that you forwarded to Jamie Burns on October 3rd, 2019?

02:28 A. Yes.

02:29 Q. And it looks like this client came to you to ask about the feasibility of adding some language on an approval screen in the ExecuTime software. Is that right?

02:29 A. Yes.

02:29 Q. And you were able to provide the client with the solution as to how they could include that language?

02:29 A. Yes, that's correct.

02:29 Q. And then you forwarded the email chain to Jamie and you told her, "Brian was onsite with Santa Rosa when Bob came to me for assistance with this request. This was after the HR Director asked Brian while he was onsite if this could be done and Brian told them no instead of inquiring with me and telling them he would follow up."

02:29 A. Yes.

02:29 Q. Why were you forwarding this to Jamie?

02:29 A. Because we had already had conversations about the things that we were running into, and so this was

just another example. And, you know, it wasn't my job duty to reprimand ICs. Things like this were taken care of by management.

02:30 Q. So you were reporting it to her so she was aware of the continued issues with Brian so that it could be addressed?

02:30 A. Correct.

02:30 Q. And was the issue that Brian -- you said, "Brian told them no instead of inquiring with me and telling them he would follow up."

02:30 Was the expectation that when an implementation consultant didn't know the answer to a client's question, that they would come to you first to see if there was an answer before telling the client yes or no?

02:30 A. Similar. They would need to check with, you know, myself, fellow I- -- implementation consultants. They had, you know, various contacts that they could go to to verify information as needed. But, yes, I would like to be kept in the loop. I would request to be kept in the loop.

02:31 Q. So your expectation was that he should have verified with yourself or another resource before giving a definitive answer to the client?

02:31 A. Yes, ma'am.

02:41 A. Yes, where I would put in a ticket to request it. I wouldn't necessarily schedule it. I didn't have control over their schedules.

02:41 Q. When you're saying "their" schedules, who are you referring to?

02:41 A. Sure. The technical team.

02:42 Q. We had talked a little bit earlier about how you worked with the client to create a solution design based on the completed client questionnaire.

02:42 What's this solution design? Is that something that you would send to the client for their feedback?

02:42 A. Yes, yes.

02:42 Q. And would you oftentimes revise the solution design based on feedback from the client?

02:42 A. Yes.

02:42 Q. So you could end up with multiple versions of a solution design for a particular project?

02:43 A. Yes. I mean, we would just keep modifying the same one, and we would do that until they were comfortable to -- enough to sign off on it.

02:43 Q. What kind of feedback would the client have?

02:43 A. You know, if it was misstated, how we were going to configure the system, or, you know, timekeeping methods that they were going to use, the number of

overtime policy configurations they need. All related to how they're going to use ExecuTime.

02:43 Q. And would the solution design discuss the client's existing time/attendance policies?

02:43 A. I'm sorry. Would you mind repeating the question?

02:43 Q. So in the solution design, would that discuss the client's existing time and attendance policies?

02:43 A. No, no, not that I recall.

02:43 Q. Would it discuss whether a client used comp time?

02:43 A. Yes.

02:44 Q. And we talked a little bit earlier about how you discussed your lawsuit with Ms. Greene.

02:44 You're aware that she had also filed a lawsuit against Tyler?

02:44 A. Yes.

02:44 Q. If Ms. Greene testified under oath that project managers supervised implementation consultants and had daily conversations with them via phone and email, is that accurate?

02:44 A. Say that one more time for me, please.

02:44 Q. Sure. If Ms. Greene testified under oath that project managers supervised their implementation consultants and had communications with them several

times a day via phone and email, is that accurate?

02:44 A. Yes.

02:45 Q. Do you think it's accurate to say that you supervised Ms. Greene and the other implementation consultants in the performance of their duties?

02:45 A. In the performance? I don't know how to answer that. I don't -- I mean, when I think of supervise, I think of, you know, me being her supervisor, which I wasn't. I was managing a project, and she was working the project.

02:45 Q. So you don't think it's accurate to say that you supervised her duties?

02:45 A. Supervise her duties? Okay. Yes.

02:46 Q. If she testified that a project manager led the project and did the majority of the integration, is that accurate, in your opinion?

02:46 A. No.

02:46 Q. If she testified that you were the first direct contact with the client, is that accurate, in your opinion?

02:46 A. No.

02:46 Q. Did you take a PMP course in 2018?

02:46 A. I was on the schedule to. No, I did not make it through the course. I was prepping to do that, but I did not actually fly out to Maine and attend the course.

working 60 to 65 hours a week at Tyler, you also had a side business at World Ventures and then another side business with Gimmie A Squeeze and then also formed your nonprofit?

03:09 A. Yes.

03:09 Q. What would you estimate to be the job duties that took the majority of your time as a senior project manager?

03:10 A. Vamping up new hires, getting them prepared to be able to conduct trainings on their own, and helping them through understanding tasks and the timeliness of that.

03:10 Q. And how much of a percentage of your time would you estimate that that took up?

03:10 A. More than 50 percent of my day, on most days.

03:10 Q. Okay. And you said ramping up new hires. When you're referring to "new hires," is that implementation consultants and project managers?

03:11 A. More so, implementation consultants.

03:11 Q. But also some new PMs?

03:11 A. That is correct.

03:11 Q. And then second to the time you spent ramping up new hires to conduct trainings on their own, what would be the next responsibility you had that took up the most -- majority of your time or the most amount of

your time?

03:11 A. Sure. Creating implementation timelines and, you know, mapping out resources to complete the different -- the various tasks.

03:11 Q. When you say "mapping out resources," what do you mean by that?

03:11 A. Just, you know, reviewing their calendars and checking their availability to complete trainings and things.

03:12 Q. So this would be for the implementation consultants?

03:12 A. Yes, ma'am.

03:12 Q. And would this also include people from the development team or tech support as well?

03:12 A. Yes.

03:12 Q. And how much of your time would you estimate that you spent on that responsibility?

03:12 A. I'd say maybe 30 percent of my time.

03:12 Q. And then what would you say took up the remaining balance of your time, the 20 percent that's left?

03:12 A. You know, following up on support issues, issue resolution, transition to support calls, updating and managing, you know, Jira tickets, and doing the large amount of copy/pasting emails from -- you know,

copy/pasting emails and making sure that stuff's in Jira, and just kind of keeping up with those tasks in Jira to ensure that they're closed out and being handled in a timely manner.

03:13 Q. What about the time that you spent conducting training? Where would that fall?

03:13 A. Good question. I would say issue -- you know, along with the issue resolution and stuff, because typically the only time I was pulled in to conduct training is when there was an issue with the original trainer.

03:14 Q. So that would fall into the 20 percent category?

03:14 A. Yeah, give or take, uh-huh.

03:14 Q. Then what about conducting calls with clients?

03:14 A. I guess that would fall in with the whole, you know, managing of the project. The budget, timelines, you know, communication with management as to where projects stand.

03:14 Q. That would be that second category, 30 percent?

03:14 A. Correct.

03:14 Q. When you said ramping up new hires and conduct training on their own took about 50 percent of your time, what all went into ramping up new hires?

03:14 I know we've talked about the feedback

that you would provide, listening to calls that they would conduct. What else would go into that?

03:15 A. Spending one-on-one time with them; you know, training them on the application to increase their knowledge; you know, assisting them with troubleshooting issues with support that they'd run into that I'm not able to, you know, address right off the bat; creating cheat sheets, just Word document cheat sheets to help them, you know, stay organized and keep up with action items that came up to ensure they follow up.

03:15 Q. So would that be similar to kind of the summary and checklists that you had -- that we saw earlier where you'd list out each project and kind of where it was and what you expected from the IC with respect to that project and -- something like that?

03:16 A. Yes, ma'am.

(Exhibit 18(A) marked.)

03:16 Q. All right. Ms. Harrison, I've shared with you what will be Exhibit 18(A). Let me know if you've got that up in front of you and when you need me to scroll down so you can see the entire document.

03:16 A. Okay, I'm ready.

03:17 Q. Did it freeze for you? It froze on my end.

03:17 A. Yes, it is frozen.

03:17 Q. There we go.

03:17 A. Okay. (Reviewing document.) Okay.
03:17 Q. Do you recognize Exhibit 18(A)?
03:17 A. Yes.
03:17 Q. This is an email that Jamie had sent out to the implementation team announcing that you were moving positions, and then your response to her?
03:17 A. Uh-huh, yes.
03:17 Q. So around October 30th, 2019, you knew that you were going to be moving into the implementation analyst role?
03:18 A. Yes.
03:18 Q. And when did you officially move into that position, if you recall?
03:18 A. November 18th of 2019.
03:18 Q. So you just spent a couple of weeks at the beginning of November helping transition off your projects?
03:18 A. That is correct.
(Exhibit 19 marked.)
03:18 Q. All right. I've shared with you, Ms. Harrison, what's going to be Exhibit 19. Let me know when you've had a chance to review that.
03:19 A. (Reviewing document.) I'm good. Uh-huh.
03:19 Q. And do you recognize Exhibit 19?
03:19 A. Yes.

03:19 Q. And this is the application that you completed for the implementation analyst role?

03:19 A. Yes.

03:19 Q. How did you learn about the role being available?

03:19 A. Talent would send out weekly, and even sometimes multiple times a week, available job opportunities.

03:20 Q. So you saw this in an internal job email alert and decided it was something you'd be interested in?

03:20 A. Yes.

03:20 Q. And what did the application process entail?

03:20 A. I first had to get approval from my manager, and then you would just -- I think once you have that approval form, you would -- I believe I printed that out along with an updated copy of my résumé, and I emailed it to the HR person responsible for that position.

03:20 Q. And then did you have an interview?

03:20 A. Yes.

03:20 Q. Who interviewed you?

03:20 A. Kayla Wagner and Michelle ... I don't remember her last name, but she's Kayla's manager.

03:21 Q. Okay. And in Exhibit 19, you say, "My personal goal has been to obtain a position that allows me to help other PMs and potentially ICs with less experience

achieve some of same milestones."

03:21 So were you moving into the implementation analyst role with the idea that you would be able to help PMs and ICs with their implementation issues?

03:21 A. Yes.

03:22 Q. Then you also say, "Currently I have the most experience within my department and that had lead me to a place of wanted to do more for our entoral" -- "entoral teams" --

03:22 A. Yeah.

03:22 Q. -- "as I see so much growth opportunity" -- or -- "growth opportunity and potential within the team I'm currently working with."

03:22 So you were the most senior project manager on the ExecuTime team?

03:22 A. That's correct.

03:22 Q. So I guess based on this description that I'm reading, it sounds like the reason you wanted to move roles is you just wanted to be able to do more for supporting the implementation consultants and project managers? Is that fair to say?

03:23 A. I mean, what initially led me to start looking for other positions was the number of hours I was having to spend managing the number of projects that I had and not really, you know, getting what I needed from the

03:24 So when you applied to this implementation analyst role, was it your understanding that you'd be working less hours?

03:25 A. Yes.

03:25 Q. What was your compensation as an implementation analyst?

03:25 A. Seventy-two five.

03:25 Q. So that was an increase from what you were receiving as a senior project manager?

03:25 A. Yes, ma'am.

03:25 Q. And when you took on the implementation analyst role, you understood that you were going to remain classified as an exempt employee under the FLSA?

03:25 A. Yes.

03:25 Q. You wouldn't be receiving overtime if you worked more than 40 hours a week?

03:25 A. Correct.

03:25 Q. Did you continue to work remotely as an implementation analyst?

03:26 A. Yes.

03:26 Q. Did you have to travel as an implementation analyst?

03:26 A. Yes. It wasn't part of my job duties, but I did, yes, uh-huh.

03:26 Q. Tell me, I guess, about the travel that you did

as an implementation analyst.

03:26 A. There was a situation with an implementation consultant and Tyler project manager that escalated for a client that was going live with ExecuTime, resulted in a mess. And our vice president of implementation services came to me and asked me if I would be willing to go on-site. I may have offered to go on-site. I don't recall how the conversation went, but I was -- you know, I was asked to go on-site and assist with -- pretty much just clean up of what occurred.

03:27 Q. Did you do any other travel?

03:27 A. Yes.

03:27 Q. What other travel did you do?

03:27 A. They hosted a couple of project management summits in Austin, Texas, so I flew out there for that. I did that twice. I traveled to Yarmouth, Maine, a couple of times to conduct ExecuTime training for project managers and implementation consultants. I think that was it.

03:28 Q. Okay. The situation you first described about an issue with the client going live where you had to go on-site and assist with cleanup, when did that occur?

03:28 A. That was May of -- that would have been May of -- let's see. May of 2021.

03:28 Q. What client was that?

03:28 A. Lawson (phonetic), Oklahoma.
03:28 Q. And you said the vice president of implementation services asked if you'd go.
03:28 Who is that, specifically?
03:28 A. Jennifer Turgeon.
03:29 Q. And what did you understand had happened that resulted in issues with the go-live date for that project?
03:29 A. The IC had went in there and ran an automatic integration -- I'm sorry. The payroll export. The automation of the payroll export was not working properly, and so the IC on that project made the decision to do a manual upload, and it blew up.
03:29 Q. And then what did you do to assist with the cleanup?
03:29 A. I had to travel out there. They wanted me there Monday morning, so I drove out there Sunday. And hosted multiple training sessions. You know, it -- it ended up being a lot more than what was initially discussed. It wasn't just a matter of fixing their payroll export stuff. It was reconfiguring ExecuTime in a lot of areas so that the calculations were being correctly handled.
03:30 Q. So what did you do to reconfigure ExecuTime?
03:30 A. So I, you know, trained -- you know, worked

with the team there at Lawson and trained them on their options on handling different things. They had a lot of overtime rules that were misfiring and not calculating overtime correctly, putting the overtime on the wrong week. So we corrected -- you know, manually corrected the overtime configurations.

03:30 Same thing with shift differential. There were situations where shift differential should have been paid but it wasn't, vice versa.

03:31 So I just worked with the team on identifying, you know, those issues and reconfiguring the rules that had been previously set up.

03:31 Q. And do you know why Jennifer came to you to ask for you to do this?
03:31 A. I don't. I don't recall.
03:31 Q. Had you been involved in that project before?
03:31 A. Yes, yes.
03:31 Q. How long were you on-site?
03:31 A. One week. From Sunday to Saturday.
03:32 Q. And were they able to successfully go live at the end of the week?
03:32 A. They were definitely in a much -- a much better position, yes. They were able to, you know, cut checks to their employees. And the situation was so bad that, you know, like, people that have child support and other

things that come out of their paycheck didn't calculate.
03:32 So by the time I left, they were able to generate those checks to send to the parents and -- yes, I don't know that they actually officially -- well, I guess, yeah, they were still considered live, so, yes. I'm sorry. There was just a lot of manual work for multiple pay periods to keep them live.
03:32 Q. And who was the project manager on that project?
03:33 A. Bobbi Davis. Bobbi, B-o-b-b-i. Last name, Davis.
03:33 Q. And you said you traveled to project management summits in Austin. Were these just kind of like conferences for different employees?
03:33 A. Yes, they were. We had stations set up and -- you know, based on the type of employee, yes.
03:33 Q. And how long did those conferences last?
03:33 A. Three days.
03:33 Q. Did other implementation analysts attend those conferences?
03:33 A. Not that I'm aware of. None from my team. I don't know of any other team.
03:34 Q. Were these conferences that you were invited to or conferences that you asked to go to?
03:34 A. Conference that I was invited to, and I was --

I was asked to do --

03:34 Q. Who invited you?

03:34 A. -- a presentation.

03:34 Kayla Wagner.

03:34 MR. HERRINGTON: Amanda, whenever it's good for you, I'd like to take a brief, five-minute restroom break.

03:34 MS. BROWN: Yeah. Let me just get through this, and then we can. Almost there.

03:34 MR. HERRINGTON: Okay.

03:34 Q. You said you presented at those conferences?

03:34 A. Yes. I had a small segment where I did a quick, 30-minute, you know, "Here's what's new with ExecuTime" type presentation.

03:35 Q. And who would you be presenting to? Who was the audience for that?

03:35 A. Other Tyler project managers.

03:35 Q. You'd be educating project managers on new features with ExecuTime?

03:35 A. That's correct.

03:35 Q. And would you -- did you put together, like, PowerPoints for these presentations?

03:35 A. I did not. The presentation was provided to me.

03:35 Q. Who provided it to you?

03:35 A. Kayla Wagner.
03:35 Q. Did you make any changes to the presentation?
03:35 A. Not that I recall.
03:36 Q. You said you traveled to Maine a couple of times to conduct ExecuTime trainings for ICs and PMs there.
03:36 Tell me about the training that you provided in Maine.
03:36 A. It was classroom style. I would have my laptop hooked up to a projector, and I was -- well, I'm sorry. The first training that I attended, I literally flew out there my first day in that role, and I observed Kayla conducting the ExecuTime training.
03:36 And then the next time they flew me out there, I conducted the training. It was classroom style, just going through the ExecuTime application, set up basic users, you know, how supervisors use the system, that type of thing.
03:37 Q. So were you teaching, I guess, implementation consultants and project managers how they would configure ExecuTime?
03:37 A. Not really. More so just showing them what's available. The majority of those users that attended that, they've already seen and trained on ExecuTime in some capacity. And so it was more just a way -- an

03:37 opportunity for them to address questions, us to discuss issues that they are running into, that type of thing.

03:37 Q. And you were able to, I guess, have these kind of trainings and answer these questions based on your experience with ExecuTime?

03:37 A. Yes.

03:37 Q. Were there any other implementation analysts for the ExecuTime product?

03:37 A. No, not at the time that I was there, no.

03:38 Q. And the implementation analyst position, was that a new role at Tyler when you applied for it?

03:38 A. Yes.

03:38 Q. And did you have any discussions with Kayla or anyone during the application process about why that role had been created?

03:38 A. I mean, she may have told me why it was created, but -- but, no, I didn't inquire as to why.

03:38 Q. Did you have an understanding of why the company had created that role?

03:38 A. I understood the need for it, yes.

03:38 Q. What did you understand the need for that role to be?

03:38 A. Just to, you know, assist all of the Tyler PMs and ICs with implementations that they were taking on for ExecuTime.

03:39 Q. And how would you have been assisting them?
03:39 A. As they ran into issues or if they had questions, they would create a ticket in CMS. I don't know the -- what that abbreviation stands for, but it was a ticketing system that they -- we had transitioned from Jira to CMS.
03:39 And so they would put the tickets in there. It would go to a queue that was assigned to me, and I would work them based on priority level.
03:39 Q. And before this role was created, if there were issues or questions related to ExecuTime, how would a PM or an IC work through those?
03:39 A. By creating Jira tickets or working with other seasoned employees.
03:40 Q. And were you one of those seasoned employees that they could come to?
03:40 A. That's correct.
03:40 MS. BROWN: Let's go ahead and take -- what do you want to do, Matthew? Five or ten minutes?
03:40 MR. HERRINGTON: I think five minutes is fine, unless you-all want ten.
03:40 THE WITNESS: I'm good with five.
03:40 MS. BROWN: Leah or Billy, do you-all have a preference?
03:40 THE VIDEOGRAPHER: I'm good.

03:51 Q. So tell me a little about -- what "best practice" templates were you creating?
03:52 A. I don't recall creating any.
03:52 Q. What about "process improvements"? Do you recall working on any process improvements as an implementation analyst?
03:52 A. No.
03:52 Q. And what about knowledge transfer materials?
03:52 A. Yes.
03:52 Q. What knowledge transfer materials did you create?
03:52 A. So out on SharePoint, it was just quick how-tos as far as configuration, how to set up a specific type of pay code, accrual code combination. I documented the Jira tickets that I worked to ensure, you know, whatever steps were taken to resolve the issue were noted. And then I created knowledge base standard -- "KBS articles" is what we referred to them as.
03:53 Q. KBFRs?
03:53 A. Articles.
03:53 Q. Oh, KB --
03:53 A. KBS.
03:53 Q. -- articles?
03:53 A. Yes, ma'am.
03:53 Q. What were those?

03:53 A. They were just quick knowledge base standard forms, that we -- you know, we take the information from the ticket we were working and basically just transfer what the question was and what we did to resolve that issue.

03:53 Then that was made accessible to internal teams as well as clients so that they can, you know, check that database before they report an issue to see if there's already a resolution out there.

03:54 Q. Okay. So you would be putting together stuff kind of based on your experience or the issues you were seeing, and then --

03:54 A. In support.

03:54 Q. -- the ICs or PMs could use that to resolve issues that they were encountering with an ExecuTime implementation?

03:54 A. Yes.

03:54 Q. There's a bullet point that says, "Provide non-billable informational sessions by webinar to implementation consultants or their clients."

03:54 Do you recall informational sessions that you -- or webinars that you participated in?

03:54 A. Yes.

03:54 Q. Can you tell me about those?

03:54 A. Sure. Just, you know, as I'm working a ticket,

sometimes I would connect with the implementation consultant so they could show me. If a ticket didn't have enough details or screenshots or whatever, I would connect with the IC to assist them with troubleshooting whatever issue or setup they were needing.

03:55 Q. Did you ever connect with clients to assist them with any troubleshooting or setup?

03:55 A. Only when management asked me to, yes.

03:55 Q. So there were, I guess, situations where you would be brought in by management to connect with a client to help with troubleshooting?

03:55 A. That's correct.

03:55 Q. And these were kind of of just, like, impromptu sessions that occurred as needed?

03:55 A. Yes.

03:55 Q. And then there's a bullet down here that says, "Assist with demonstrations and attend demonstrations to expand knowledge of Tyler products. In some instances may conduct demonstrations to perspective clients."

03:56 Can you tell me about the responsibilities that you had with that bullet point?

03:56 A. Which number bullet point is that?

03:56 Q. It's -- I apologize. It wasn't on the screen. Here it is.

03:56 A. Oh, okay.

03:56 Q. "Assist with demonstrations."

03:56 A. (Reviewing document.) I don't recall doing any of that.

03:56 Q. And then there's this bullet point about "Respond to module- or system-specific questions in proposal documents."

03:56 Can you tell me about that?

03:56 A. I don't recall doing that either.

03:57 Q. Then there's a bullet point that says, "May assist the implementation field staff with conversion."

03:57 Tell me about that.

03:57 A. I don't recall doing that. I didn't do conversions.

03:57 Q. Did you ever go on-site other than the one time that we talked about already?

03:57 A. No. Not in this position, no.

03:57 Q. Then there's a bullet here that says, "Provide follow-up assistance to clients on highly complex applications or processes, as necessary."

03:57 Tell me about the interactions that -- with clients.

03:57 A. Usually it was just connecting with the client so they could show me exactly what issue they were running into so that I could make my own notes and then go back and either troubleshoot the issue or pull in

03:58 other teams to assist.

03:58 Q. What other teams would you pull in?

03:58 A. Could be development. I worked a lot with our development team. I worked a lot with the TSM team, which is the technical services management team.

03:58 Q. Any other team?

03:58 A. That's it.

03:58 Q. How would you know when you needed to loop in the TSM or development team?

03:58 A. Usually if it was an application functionality-type deal, that would be development. And if it was a hardware issue, that would be technical services management team.

03:59 Q. And were there issues that you were able to resolve on your own without bringing in other teams?

03:59 A. In some cases, yes.

03:59 Q. Tell me about those.

03:59 A. You know, some of it was just questions about, you know, what options we offer as far as how certain policies can be configured. A lot of times the ICs or PMs would already have setup done but something wasn't quite working correctly. So, you know, I'd be able to log in and identify there was just a quick setting that hadn't been enabled or that needed to be disabled.

04:00 Q. So was it a requirement for this position that

you be highly experienced in ExecuTime?
A. I mean, it wasn't expressed to me in that way, so I can't say yes or no to that.
Q. In your opinion, could someone have done the implementation analyst position that you held without being highly experienced in ExecuTime?
A. I don't know.
Q. When an implementation consultant or a project manager contacted you to say something wasn't working, maybe a setting wasn't enabled or disabled, how were you able to guide them to the solution?
A. I would usually create steps directing them to the area of the application they needed to make the correction.
Q. And the steps that you would create to provide to them, was that based upon your knowledge of the ExecuTime software?
A. Yes.
Q. As an implementation analyst, you helped, I guess, troubleshoot or find solutions to these issues so that the implementation schedule would not be disrupted?
A. Yes, that's correct.
(Exhibit 21 marked.)
Q. Okay. I have marked what will be Exhibit 21. Do you see that in front of you, Ms. Harrison?

04:02 A. Yes, I see that.
04:02 Q. And are you familiar with Exhibit 21?
04:03 A. Yes.
04:03 Q. What is Exhibit 21?
04:03 A. It looks like a report that was pulled from CMS regarding a ticket -- or CRM. I was stating it incorrectly. Sorry. CRM. Just documents of a ticket or a case that I had worked.
04:03 Q. How did tickets come to you through CRM?
04:03 A. There's a couple of ways. They -- they could -- the PMs and ICs could go in and enter the ticket directly into CRM, or they could send an email to -- I don't remember the email address, but they could send an email to a specific email address for the analysts, and they would automatically create a ticket with basic information in CRM that would come to my queue.
04:04 Q. So PMs and ICs that were looking for assistance could reach out to you directly?
04:04 A. They weren't supposed to. They were supposed to enter a ticket and follow that path so that tickets could be worked based on priority. And then, you know, like I said, they could email this -- a group analyst email address, and it would create a ticket for them.
04:04 Q. So they weren't supposed to, but they did on

occasion?

04:04 A. Yes.

04:04 Q. Would these be PMs or ICs that you had worked with previously who knew about your background?

04:04 A. Yes.

04:04 Q. So looking at Exhibit 21 -- and I can scroll through it as you need -- what was the issue with this ticket?

04:05 A. It looks like they were having an issue with the time and attendance application of ExecuTime creating notifications. I'd probably have to see more of the details because there were different types of notifications that ExecuTime did.

04:05 Q. So let me scroll down, and let me know when you've had a chance to review it.

04:05 A. Okay. (Reviewing document.) Okay. (Reviewing document.) All righty. (Reviewing document.) Okay. (Reviewing document.) Okay. (Reviewing document.) All righty.

04:06 Q. And it looks like it starts just repeating the email chain and --

04:06 A. It does, yeah.

04:06 Q. So tell me a little bit more, after you've had a chance to look at that, look at this, what the issue exactly was.

04:06 A. Sure. So the way the security roles were built, the security rules not only defined, you know, the menus and the employee access, but it -- it's also where you would define who would get an email notification when certain functions within the application were performed. And so the issue was in -- in that configuration, in that setup.

04:07 Q. And how were you able to determine that was where the issue was?

04:07 A. Just based off experience.

04:07 Q. And so how did you resolve that issue?

04:07 A. Just, you know, logged into the client's system, reviewed the setup for the employee that was provided, and I was able to easily see that the setup was incorrect.

04:07 Q. And then while you were logged in, would you fix the setup so it was correct?

04:07 A. In this instance, no. I noticed as you were scrolling that the issue was documented in their prod system. And so I would -- I would not make configuration changes in a prod system. I would provide that feedback to the project manager or the IC that reported it, and they would do what they needed to.

04:08 Q. So you told them how to make that configuration change?

04:08 A. Say that one more time. It kind of went out.
04:08 Q. When -- so here you said it was a process. Since you wouldn't have done it yourself with the configuration change, you would have relayed to the PM or the IC how to make the configuration change?
04:08 A. Correct.
04:08 Q. It sounds like in other instances sometimes you would just make the configuration change?
04:08 A. Right, if it was in a test environment.
04:08 Q. And can you tell how this ticket came to you?
04:08 A. Can I tell how it came to me?
04:08 Q. Yeah. Was this where someone had emailed the group email, or did it come in to you directly?
04:09 A. Yeah, no, it looks like someone actually went in and manually entered the ticket in CRM.
(Exhibit 22 marked.)
04:09 Q. All right. Ms. Harrison, I've introduced what's Exhibit 22. Let me know after you've had a chance to look at it or if you need me to scroll down.
04:10 A. Okay. (Reviewing document.) Okay, if you wouldn't mind scrolling down. (Reviewing document.) Okay. (Reviewing document.) All righty. (Reviewing document.) Okay. (Reviewing document.) Okay. (Reviewing document.) Okay. (Reviewing document.) Okay. I think it's ...

04:11 Q. So is Exhibit 22 another example of a CRM ticket you received as an implementation analyst?

04:11 A. Yes.

04:11 Q. And what was the issue with respect to this ticket?

04:12 A. It was a user error, misunderstanding of -- a misunderstanding of how the filters are used.

04:12 Q. And so how were you able to resolve this ticket?

04:12 A. I provided, you know, suggestions for what should be used in the filter when trying to generate an exclusive list of a certain type of employees.

04:12 Q. And the suggestion that you provided, was that based on your experience with ExecuTime?

04:12 A. Yes.

04:12 Q. And were you able to tell how this ticket came to you?

04:12 A. It looks like it was a ticket that was created by the user, the implementation consultant.

04:13 Q. Were there instances where an implementation consultant or a PM would reach out to you through teams with urgent issues?

04:13 A. Yes.

04:13 Q. What were examples of the kind of urgent issues that would merit a team meeting?

04:13 A. They were in the process of going live and having an issue with the payroll export. They were signing in to conduct a training of some sort, and the ExecuTime application was not accessible, throwing errors. Some things that come off the top of my head at the moment.

04:14 Q. In a situation where someone contacted you with issues going live and a payroll export not working, what -- what would you do in response?

04:14 A. Initially I would -- you know, I could be working on what we would consider level one, critical cases. It just kind of depends on what I was doing at that time. And they let them know, Okay, you know, I've got it noted. Go ahead and enter the ticket with the information.

04:14 And as soon as, you know, I wrap up with whatever -- if I'm working on an existing critical issue, then I would, you know, attend to that one next. If I wasn't working on something that was critical at that moment, then I would usually stop what I'm doing and assist that -- assist that project manager or that IC, and then I would later create the ticket, because nine times out of ten, they were either in the middle of training or they were on-site, you know, doing something that -- that would prohibit them from being able to

create that case.
04:15 Q. And so can you think of how in a certain situation you have resolved an issue with an export during go-live?
04:15 A. Uh-huh. Yeah, I can.
04:15 Q. And how did you resolve it?
04:15 A. A lot of times it was just by logging into the system and there was a simple -- you know, not simple -- I won't say "simple," but there would be a setting. Again, it's a setting that was missing, whether that be in ExecuTime or on the payroll side.
04:15 Q. And you said you don't want to use the word "simple," but to you, I mean, given the experience you had with ExecuTime, it was simple, yeah.
04:16 A. Yes, uh-huh.
04:16 Q. What would you do if you came to an error -- someone had reached out to you with a ticket that you couldn't resolve? How would you, I guess, escalate it if you weren't able to resolve it?
04:16 A. I would either create another -- a sub-CRM ticket for the technical services team to assist, and I would tie that ticket to my existing ticket, or if it was something that needed to go to development, I had a different system that I would have to use to create a development ticket.

04:16 And then typically there were requirements that needed to be on that ticket if I was escalating it to the technical team or development. So, you know, screenshots, exact sets to replicate the issue type of thing.

04:17 Q. And you would be able to use your judgment as to which team would be appropriate to get that subticket?

04:17 A. Usually. I mean, if not, I would just -- I would go to Kayla. And I did, you know, lean on Kayla quite a bit for that initially.

04:17 Q. Was Kayla your supervisor the entire time you were there?

04:17 A. The entire time I was in the analyst position, yes, ma'am.

04:17 Q. Yes. Sorry.

04:17 A. Uh-huh. No worries.

04:17 Q. I should have -- the entire time you were an implementation analyst?

04:17 A. Yes.

04:17 Q. Did anyone report to you when you were an implementation analyst?

04:17 A. No.

04:17 Q. Was there anyone that you provided feedback to about their performance while you were an implementation

analyst?

04:18 A. Not that I recall.

(Exhibit 23 marked.)

04:18 Q. All right. Ms. Harrison, I've shared with you what will be Exhibit 23. Do you see that in front of you?

04:18 A. I do.

04:18 Q. And I can scroll through this for you as you'd like. Just let me know when you need me to.

04:18 A. All righty. (Reviewing document.) Okay, I'm ready. (Reviewing document.) I'm ready. (Reviewing document.) Okay, I'm ready. (Reviewing document.) I'm ready. (Reviewing document.) Ready.

04:20 Q. And we can certainly go through this whole thing if you want to. It's 63 pages.

04:20 A. Right.

04:20 Q. I just want to make sure I've given you enough of it to make sure you're familiar with what this document is.

04:20 Do you recognize it after what we've gone through, or do you want to keep going through it?

04:20 A. No. I recognize it. It took a minute. It looks like these are screenshots from Confluence.

04:20 Q. Okay. Yeah. So what is Confluence?

04:20 A. It was a repository for just client

information, or, you know, we stored client documents there, but then there was also -- the analyst team had an analyst page that we would, you know, document different things that were going on with the analyst team. There may be tips and tricks on how to handle different issues.

04:20 What you have on the screen here was a representation of fixes that were coming down the line and a ticket number that those fixes were attached to so that users can go read up on it and get familiar with it and know what version it would be fixed in, that type of thing.

04:21 Q. So was this document -- or Confluence as it existed, I guess, maybe on the Internet, was it a resource document for implementation analysts, or was it also for the implementation consultants and project managers?

04:21 A. It was designed for the implementation consultants and project managers, from what I understand. They had this in place when I joined the team.

04:21 Q. And was this kind of like a living document, where it would be updated as different issues came in and were identified?

04:21 A. Yes, that's correct.

04:21 Q. How would it be updated?

04:21 A. We -- we all had access to it, and so it was -- you know, we all had access to the Confluence space, and so a lot of it would be maintained by Kayla. She enjoyed doing it.

04:22 And then when there were -- you know, if there were things that I ran into where I thought would be a benefit to ICs or PMs, I would usually meet with her to get her discretion on whether it was suitable or not, and -- and we would work together to add that to the -- the page.

04:22 Q. Okay. So based on what you were seeing as an implementation analyst, you might have an idea for something to be added, and you'd suggest it to Kayla, and then you-all would work together on getting it incorporated?

04:22 A. Correct. There were -- there were so many pieces to this Confluence page. There were some things that I could just go at, and then there were others that I would need to meet with Kayla and get approval on that first.

04:22 Q. And why if you -- did you have a sense of which things created -- which additions would require approval and which ones wouldn't?

04:22 A. Would you mind asking the question again?

and then also being on-site. I don't know what percentage that would be.

04:24 Q. What would you say took up the majority of your time as an implementation analyst?

04:25 A. Caseload. The number of cases that were coming in from the project managers and IC, as well as the number of cases that were existing at the time I joined the team.

04:25 Q. And that would be in the form of either the CRM tickets or I- -- ICs and PMs reaching out to do team meetings? That is kind of what you mean by "caseload"?

04:25 A. Yes, ma'am.

04:25 Q. And how much of your time would you say that took up?

04:25 A. More than a hundred percent.

(Exhibit 24 marked.)

04:26 Q. Okay. Ms. Harrison, I've introduced what will be Exhibit 24.

04:26 A. Okay.

04:26 Q. Do you have that in front of you?

04:26 A. I do.

04:26 Q. And are you familiar with Exhibit 24? Bigger for you.

04:26 A. Oh, thank you. Yes, I am familiar with it.

04:26 Q. And is Exhibit 24 the alternative work schedule

reported and an article was created, it would come up and usually produce steps to resolve that issue or give them knowledge of the fact that it's a known issue and when it's expected to be corrected.

04:35 Q. What about "OE sessions"?

04:35 A. "OE sessions"? Those are the -- me going to Maine to conduct ExecuTime training sessions.

04:35 Q. What does "OE" stand for, if you know?

04:35 A. Ongoing education.

04:35 Q. And what about the "'ExecuTime 101' training sessions"?

04:35 A. I'm not really sure what that -- I believe that that's going to be -- that was, you know, just me meeting independently with PMs or ICs as they reported issues, and training them, you know, on -- wait. Sorry for the noise, if you can hear that in the background.

04:36 There were forums that I would have to host, like, just quick, 30-minute to an hour forums that would take place every quarter. And during that forum, we would come up with content that would need to be discussed on that forum. Usually it's new functionality or, hey, this is what's new on our analyst Confluence page, that type of thing.

04:36 Q. So they're kind of educational events?

04:36 A. Yes, ma'am. Uh-huh.

04:36 Q. And who would be hosting those?
04:36 A. Various implementation consultants -- I'm sorry, analysts. Implementation analysts. I would host for -- I would host for the ExecuTime forums, and then other analysts would host for their product.
04:37 Q. And the attendees would be the PMs and ICs?
04:37 A. That is correct. Directors.
04:37 Q. And then under the --
04:37 A. Anyone who wanted to attend. I'm sorry.
04:37 Q. No, no, no. I did not mean to cut you off. That was my fault.
04:37 So under the core competencies, for job knowledge, you were ranked "high solid." And it looks like Kayla said, you know, that you -- if you didn't know the answer, you were willing to dig to find it and work the issue.
04:37 What did you understand her to mean by that?
04:37 A. You know, that I pretty much would go above and beyond to find the -- you know, find the answer or, you know, figure out who could provide the answer to the client and/or implementation team. Researching, uh-huh.
04:37 Q. So I know we've talked about when you'd bring in the other teams. How would you find the answer or research when you -- if you didn't bring them in to find

a solution?

04:38 A. I wasn't the only one creating KCS articles. There was multiple departments and teams that were doing that. So I would also search KCS. I would search CRM to see if the issue has been reported before. I would search portals for documentation. Some things, I would have to log in to a beta instance and actually test myself, try to recreate the issue, and talking to TSM and dev. Those are a few different things that I would do to try to find resolution.

04:38 Q. And under "Decision Making," she rated you "solid" and said, "Talia knows when to seek intervention and when to work on an issue on her own."

04:38 What did you understand of when you needed to seek intervention for an issue?

04:39 A. When an issue became a showstopper or -- for the client or it was going to interfere with project timelines, budgets and things of that nature.

04:39 Q. It looks like here under "Work Quantity & Quality" you were rated a "high solid." And Kayla said, "She has taken it all well and continued to provide consistent feedback and solutions to her clients."

04:39 So that would be the PMs and the ICs as your clients?

04:39 A. Yes.

Q. And the feedback and solutions would be, I guess, resolving the issues as they came to you as far as ExecuTime implementations?

A. Yes.

Q. And then under "Teamwork," you were rated "solid." And at the end of it, she says, "Over the course of the upcoming year, Talia will use her leadership skills to help improve processes in the team and relationships with both internal teammates and teammates in other divisions or departments."

What did you understand Kayla to be referencing there?

A. Just, you know, Kayla used to -- she would always tell me that I, you know, brought leadership to the table, and she always encouraged me to, you know, use that to help create policy -- not policies, but more so just suggestions on handling, you know, the types of issues that were coming -- that came up in cases. You know, I can't really say exactly what she meant, but I do know she used to speak of, you know, my leadership skills quite often.

Q. Did she tell you specifically, like, what she thought demonstrated your leadership skills?

A. I don't recall her words exactly, no.

Q. You said she was encouraging you to use, I

interacting with PMs and ICs, but it did sound like, when we talked about it earlier, sometimes you would interact with the clients directly?

04:43 A. That is correct, uh-huh.

04:43 Q. When you were a project manager, did you -- you also received performance evaluations?

04:43 A. Yes.

04:43 Q. Did you meet with your manager to discuss those?

04:43 A. Yes.

04:43 Q. Do you recall any of the performance evaluations disagreeing with any of the feedback you had received?

04:43 A. No.

04:43 Q. And then you resigned your employment on June 17th, 2021; is that right?

04:43 A. Yes, ma'am.

04:43 Q. And did you have another job in place when you resigned?

04:43 A. Yes.

04:43 Q. And where was that?

04:44 A. It's called Aderant.

04:44 Q. How do you spell that?

04:44 A. A-d-e-r-a-n-t.

04:44 Q. And where is that located?

04:44 A. Their main office is Atlanta, Georgia.
04:44 Q. And did you work remotely?
04:44 A. I do, uh-huh.
04:44 Q. Are you still working with them currently?
04:44 A. Yes.
04:44 Q. And what's your position with Aderant?
04:44 A. I'm an associate project manager.
04:44 Q. And is your position as an associate project manager classified as exempt under the FLSA?
04:45 A. Yes.
04:45 Q. And when you applied for the job with Aderant, did you have an updated version of your résumé that you used?
04:45 A. I did touch up my résumé, yes.
04:45 Q. And do you have a copy of that updated version of your résumé?
04:45 A. I cannot find it.
04:45 Q. And how did you learn about the job opportunity with Aderant?
04:45 A. Suzanne Greene.
04:45 Q. Does she currently work there?
04:45 A. She does.
04:46 Q. What damages are you seeking in your lawsuit?
04:46 MR. HERRINGTON: I'm going to object to the form. It's vague.

04:58 Q. Okay. So I want to know, you know, as an implementation analyst --

04:58 MR. HERRINGTON: This is Rudy, by the way.

04:58 Q. As an implementation analyst, how many hours a week were you working in an average week, if you can -- if you can tell me about -- if there is such a thing, and how do you know?

04:58 A. So on average, I was working a minimum of 60 to 65 hours a week. And I know because there's -- I know that there's emails and documentation showing that I was working until the wee hours of the night and sometimes even into the early morning hours.

04:59 Q. And you're talking about the time period you were an implementation analyst?

04:59 A. I'm sorry. I'm sorry. I'm talking about the -- in the project management role.

04:59 In the analyst role, yes, there were multiple times, weekly, daily, where I was having to work into the evening just to keep up with the caseload and to make sure that trainings weren't impeded because they're not getting responses from me. You know, we couldn't have ICs canceling training because they weren't getting what they needed from me. And I was the only one supporting the entire IC and project management team when it came to ExecuTime.

weekend?

05:03 A. Always, every weekend. Every -- every weekend I -- I was working.

05:03 Q. Were you working on the weekends at all when you were an implementation analyst?

05:03 A. I would, yes. I did, uh-huh.

05:03 Q. Earlier you used the term -- and I say "earlier." I mean much earlier today, you used the term "managing the budget."

05:03 A. Sure.

05:03 Q. What did -- what does "managing the budget" mean?

05:03 A. Just making sure that as we're completing different tasks throughout the implementation life cycle, that we're not exceeding the number of hours purchased in the contract. And then, of course, you know, making -- you know, monitoring it so where if we get too close to a specific number in that budget, that, you know, we're reaching out and discussing, you know, the need for additional hours.

05:04 Q. Were there any guidelines in place for what constituted too close to the -- to the limit?

05:04 A. No. Everybody kind of had their own thing.

05:04 Q. Okay. And did you see anything about the budget other than the number of implementation

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

TALIA N. HARRISON,	*	
	*	
Plaintiff,	*	
	*	
vs.	*	No. 4:21-cv-00607-ALM
	*	
TYLER TECHNOLOGIES, INC.,	*	
	*	
Defendant.	*	

****
REPORTER'S CERTIFICATION
ORAL AND VIDEOTAPED DEPOSITION OF
TALIA N. HARRISON
JANUARY 19, 2022
****

I, LEAH K. OSTEEN DOW, Certified Shorthand Reporter in and for the State of Texas, hereby certify to the following:

That the witness, TALIA N. HARRISON, was duly sworn by me and that the transcript of the oral deposition is a true record of the testimony given by the witness;

I further certify that pursuant to FRCP Rule 30(f)(1) that the signature of the deponent:

_XX__ was requested by the deponent or a party before the completion of the deposition and is to be returned within 30 days from date of receipt of the transcript. If returned, the attached Errata contain

any changes and the reasons therefor;

____ was not requested by the deponent or a party before the completion of the deposition.

I further certify that I am neither counsel for, related to, nor employed by any of the parties or attorneys to the action in which this proceeding was taken. Further, I am not a relative or employee of any attorney of record in this cause, nor am I financially or otherwise interested in the outcome of the action.

Ms. Brown - 6 hours, 23 minutes

Mr. Herrington - 0 hours, 12 minutes

Subscribed and sworn to on this the 26th day of January, 2022.

Leah K Osteen

____

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